

EXHIBIT A

Table of Contents

1. Executive Summary	
1.1 Analytical Approach: Process Safety Analysis	1
1.2 Regulatory Requirements	1
1.3 BP Violations	1
1.4 Fraudulent Documents	2
1.5 Critical Nature of Fraudulent Documents	2
1.6 Potential for Catastrophic Event	2
2. Analytical Approach: Process Safety Analysis	4
2.1 Industry Basis: Process Safety Management (PSM)	4
2.2 PSM	4
2.3 Process Safety Management (PSM)	4
2.4 Registration/Licensure of Professional Engineers (PEs)	5
2.5 Present Texas Engineering Practice Act	5
2.6 Proper Engineering is Essential	6
2.7 Proper Engineering	7
2.8 PSM Recognizes and Teaches	7
2.9 Disasters Resulting from Lack of Proper As Built Documentation	8
2.10 Atlantis is On the Road to Disaster	10
2.11 BP's Failure to Learn	10
3. Regulatory Requirements	12
3.1 Regulations Considered	12
3.2 API Recommended Practices Adopted by Reference – Subchapter H and I	12
3.3 API Recommended Practices Used With the “Adopted by Reference”	12
3.4 Requirements of 30 CFR 250 Subpart I [2006]	13
3.5 Regulatory Requirements Under Subpart I	13
3.6 Requirements of 30 CFR 250 Subpart I [2002]	15
3.7 Requirements of 30 CFR 250 Subpart H [2006]	15
3.8 Regulatory Requirements Under Subpart H	16
3.9 Scope of Subpart H	16
4. Failure to Comply with Regulatory Requirements Under Subpart I	19
4.1 BP is in Violation of the Subpart I Regulations in Two Major Respects	19
4.2 2002 v. Post-2005 Regulations	19
4.3 On July 21, 2010 BOEMRE Issued a Request to BP to Produce	19
4.4 As Built Documents	19
4.5 Certified by Registered Professional Engineers	25
4.6 The Hazards thus Created are Discussed in Section 6.0 Below	27
5. Failure to Comply with Regulatory Requirements Under Subpart H	28
5.1 BP is in Violation of the Production Safety System Regulations in Two Major Respects	28
5.2 Disputes Which Do Not Affect This Opinion	28
5.3 30 CFR 250.802(e)(5) (Production Safety Systems) Requires...	28
5.4 Application for Approval of the Production Safety System	28
5.5 Second Submission During Investigation	29

Table of Contents

5.6 Notwithstanding the Prohibition on the Use of “Engineer” by Non-Licensed Persons	30
6. What Difference Does it Make? Criticality of BP Violations	34
6.1 Under Subpart I – Design	34
6.2 Hull and Floating Systems – Construction	34
6.3 It is highly probably that hidden defects in the structure will become apparent...	35
6.4 BP attempts to Justify the Fact that DSME Personnel Were Not Qualified	35
6.5 Defects Under Subpart H	36

Appendices:

Appendix A – Personal Background, Education and Experience

Appendix B – Materials Reviewed by Mike Sawyer

Appendix C – Deposition & Trial Testimony in United States by Mike Sawyer

Appendix D – Fee Schedule

Appendix E – MS Spreadsheets 1 thru 7

Appendix F – BP Control Systems Issues Documents

Appendix G – Previous reports by Mike Sawyer

1.0 Executive Summary

1.1 Analytical approach: Process Safety Analysis -- My review and analysis of the issues with BP Atlantis is from my viewpoint as an experienced process safety engineer. Process Safety Management (PSM), and Process Safety Engineering are based on the concepts of safe management of the process industries, developed primarily by the petrochemical industry through the American Petroleum Institute. Since its first major introduction, in API Recommended Practice 750, 1st Edition, January 1990, Management of Process Hazards, process safety management has been adopted worldwide as the standard for achievement of safe operation of the process industries. It has been adopted into Federal law and regulations, including the Clean Air Act (42 U.S.C. 7412(r)(7)(A); 40 CFR Part 68, Risk Management Plan) and Occupational Safety and Health Act regulations, 29 CFR 1910.119.

1.2 Regulatory Requirements – MMS regulations applicable to BP Atlantis at the time of its design and construction included:

1.2.1 30 CFR 250 Subpart I [2002] and [2006]: Both versions of the regulation contain requirements that the design be certified by Registered Professional Engineers and that the certified design and As Built drawings and specifications be maintained and available to MMS for inspection.

1.2.1.1 BP did not comply with these requirements and its certification that it had done so was false.

1.2.1.2 30 CFR 250 Subpart H[2002] and [2005]: Both versions contain requirements that the Production Safety System be approved by Registered Professional Engineers.

1.2.1.3 BP did not comply with these requirements and its certifications that it had done so were false.

1.3 BP Violations –

1.3.1 For the critical structural elements of the hull of the floating platform, about 1% of the design drawings were certified by registered professional engineers, and about 5% were documented As Built.

1.3.2 For the topside structure, about 63% of the design drawings were certified by registered professional engineers for their latest revision; only 1.2% were documented “As Built.”

1.3.3 For the critical production safety system, BP was required to submit its design to MMS for approval; it submitted 522 drawings it claimed were approved by registered professional engineers.

- 1.3.3.1 *None* of the drawings were certified by registered professional engineers. Only 21% are now stamped "As Built"; they still have no engineering certification.
 - 1.3.3.2 **Some As Builts conflict with each other** so that all cannot be correct. One critical document, the SAFE chart, is based on other documents which either do not exist or have no engineering approval.
- 1.4 **Fraudulent Documents.** The documents in question look like valid engineering documents when, in fact, they are not because they are not approved by licensed engineers who are the only persons authorized by law to issue engineering documents. They were also fraudulently presented to BOEMRE as As Built documents when, in fact, they are not under BP's own internal specifications. Because the documents were presented to MMS and BOEMRE as something they are not, they are properly considered false, fraudulent and deceptive imitations and will be so labeled in this report.
- 1.5 **Critical Nature of Fraudulent Documents** – Experience has shown that it is not possible to design, build and operate a complex petrochemical facility on land, much less at sea, without competent engineering which adheres to recognized PSM standards, including designing and construction standards.
 - 1.5.1 The fraudulent documents submitted by BP to the government and maintained in its offices encompass virtually the entire design and construction process of the most critical portions of Atlantis: its hull and floating structure, its topsides structure and its production safety system, including its controls. Each fraudulent document shows that competent engineering of that subject was not performed.
 - 1.5.2 Atlantis lies 150 miles south of New Orleans in 7000 feet of water. It produces from the deepest water, in the harshest, most technologically challenging environment on the planet. It must withstand Category 5 hurricane force winds and seas while maintaining the integrity of vertical oil pipelines descending over a mile to the floor of the Gulf of Mexico. Yet its hull structure and its process, emergency and subsea controls were designed by persons not licensed as engineers.
- 1.6 **Potential for Catastrophic Event**
 - 1.6.1 Even before start of production, Atlantis' faulty control system began to issue unwanted signals shutting down its generators. After the start of production, Atlantis suffered repeated loss of well control in multiple

wells over a period of many months due to multiple types of controls system failures. One well was leaking and another shut in. These losses of well control were “near misses” of catastrophic failures. These are results of inadequate engineering design and construction.

- 1.6.2 Numerous other inconsistencies and contradictions show widespread lack of proper engineering design, with probable numerous defects.
- 1.6.3 If Atlantis is allowed to continue to operate in this condition, an eventual catastrophic failure is virtually certain.

2.0 Analytical Approach: Process Safety Analysis

- 2.1 **Industry Basis: Process Safety Management (PSM)** was developed by the American Petroleum Institute (API) after the Bhopal tragedy and other chemical disasters made clear the need to greatly improve efforts toward safety in the process industries. API Recommended Practice 750, 1st Edition, Management of Process Hazards, was published in January, 1990. Within a few years, it had been enacted into Federal laws including OSHA and the Clean Air Act.
- 2.2 **PSM** applies to highly hazardous facilities which process volatile, flammable or explosive, high energy, high pressures chemicals. Such facilities are both highly dangerous and highly complex. The complexity is necessary in order to both process and contain such highly hazardous chemicals. That complexity requires written documentation to support common understanding of the specifics of their operation by the many individuals involved in the design, construction and operation of the facilities.
- 2.3 **Process Safety Management (PSM)** has 14 elements, the first and most fundamental of which is **Process Safety Information (PSI)**. PSI most fundamentally requires accurate documentation of the design and As Built condition of every process plant. It incorporates the requirement that the engineering design be documented to show compliance with applicable standards, and that up-to-date documentation be maintained for the life of the plant.
 - 2.3.1 **The Outer Continental Shelf Lands Act (OCSLA) regulations incorporate the fundamentals of PSI** by requiring design certification and approval by registered professional engineers, compliance with specific applicable standards and maintenance of As Built documents.
 - 2.3.2 **Documented PSI is A Necessity for Safe Operation** – Every aspect of safe operation depends on accurate PSI documentation. Hazard analyses, routine inspection and maintenance, proper operating procedures, training, and warnings all require accurate documentation of every detail of the facility and its operation.
 - 2.3.3 **Proper engineering and proper documentation are foundations of PSM** – The regulatory requirements that engineering be certified and approved by registered professional engineers, and that certified designs and As Built drawings be maintained by the owner, are essentially the same as the foundation requirements of PSM as embodied in other Federal

statutes and regulations. They are essential elements in the safe construction and operation of a process facility.

- 2.4 **Registration/ licensure of Professional Engineers (PEs)** is governed by the state law. All states and the District of Columbia have similar laws providing for the registration or licensure of PEs, and restricting the practice of engineering to licensed engineers. These laws were enacted after a series of explosions and similar disasters resulting from the lack of proper engineering in the first half of the 20th century. In Texas, the New London school explosion of 1937 killed an undetermined number of people; estimates vary from 296 to 319, but could be more. The disaster was the impetus for the enactment of Texas' engineering regulations.
- 2.5 **Present Texas Engineering Practice Act** -- As discussed in detail later in this report, BP certified that designs for Atlantis were certified by Texas registered professional engineers. The Texas Engineering Practice Act is codified as Chapter 1001, Texas Occupations Code. The references in this section relate to the sections of the Act as codified in that Code.
- 2.5.1 No person may engage in the practice of engineering unless that person holds a license issued under the Act. (Section 1003.301).
- 2.5.2 "Practice of engineering" includes "the performance of . . . any . . . service . . . which requires engineering education, training, and experience in applying special knowledge of judgment of . . . engineering sciences to that service . . ." It includes consultations, investigations, evaluations or providing expert engineering opinions, design, conceptual design, or conceptual design coordination of engineering works, or the development of plans or specifications for engineering works. (Tex.Occ.Code 1001.103(b) & (c)).
- 2.5.3 Only a licensed engineer may make any professional use of the term "engineer" or be represented in any way as being an "engineer." (Tex.Occ.Code 1001.004 (c)).
- 2.5.4 Upon receiving a license, a licensed engineer is required to obtain a seal (sometimes referred to as a "stamp") in the design authorized by the Texas Board of Professional Engineers showing the licensed engineer's name, the phrase "licensed professional engineer" or "registered professional engineer"; the seal also shows the license number for that engineer. (Tex.Occ.Code 1001.401(a)).

- 2.5.5 “A plan, specification, plat, or report issued by a license holder for a project to be constructed or used in this state must include the license holder’s seal placed on the document.” (Tex.Occ.Code (1001.401(b)).
- 2.5.6 The Texas Board of Professional Engineers has issued “Board Sealing Rules” which explain that the purpose of the seal is to assure the user of the engineering product that the work has been performed or directly supervised by the professional engineer named and to delineate the scope of the engineer’s work. (Tex.Admin.Code 137.33).
- 2.5.7 The term “direct supervision” includes approval. “Direct supervision-- The control over and detailed professional knowledge of the work prepared under the engineer's supervision. The degree of control should be such that the engineer personally makes engineering decisions or personally reviews and approves proposed decisions prior to their implementation. The engineer must have control over the decisions either through physical presence or the use of communications devices.” (22 Tex.Admin.Code 131.81(10).
- 2.5.8 **Registered Engineering Company** –The Engineering Practice Act also allows “registered engineering companies.” Such companies self-register, without any approval by the Board of Professional Engineers, simply by filing a registration, including a list of its employees who are licensed engineers. The company’s logo or letterhead is not an engineering seal authorized by the State of Texas. Under the Act, engineering companies must practice **only** through licensed engineers. “Each service, work or act performed by the business entity that is part of the practice of engineering is either personally performed by an engineer or directly supervised by an engineer who is a regular full time employee of the business entity.” (Tex.Occ.Code § 1001.405(e)(3)).
- 2.6 **Proper Engineering Is Essential to Safe, Design, Construction and Operation of the facility.** This is true for many reasons:
 - 2.6.1 **Atlantis is a petrochemical plant** which processes large quantities of highly flammable and explosive petrochemicals under extreme high pressures; during such processing, such petrochemicals must be contained without release; if there is an inadvertent release, catastrophic explosion, fire and continuing release is likely, and is likely to result in immediate death or severe injury to persons aboard the facility and immediate and irreparable harm to the environment.

- 2.6.2 Atlantis and all such facilities consist of highly complex interrelationships of:
 - 2.6.2.1 highly flammable raw materials, under extremely high pressure which requires containment;
 - 2.6.2.2 complex metals, materials, welding and other requirements related to creating containment without leakage;
 - 2.6.2.3 complex geological and physical scientific knowledge, related to reservoir and conditions and control;
 - 2.6.2.4 complex logical, mechanical-electrical and chemical engineering relationships regarding process flow paths, piping, valving and their connections, instrumentation and data paths;
 - 2.6.2.5 complex logical and electrical relationships related to controls and their operations;
 - 2.6.2.6 multiple marine design requirements relating to design of the floating vessel and its mooring sufficient to withstand Category 5 hurricane forces;
 - 2.6.2.7 requirements for power production, personnel quarters, transportation of personal, emergency evacuation facilities, and
 - 2.6.2.8 design requirements contained in many, diverse industry standards involving multiple engineering specialties.
- 2.7 **Proper Engineering** – Careful engineering of designs and construction of such facilities to comply with modern standards requires careful organization and integration of many parts of a highly complex puzzle. Where proper engineering by qualified engineers is not done, failure, often catastrophic, is virtually certain. Such facilities cannot be safely designed by unqualified persons.
- 2.8 **PSM recognizes and teaches that the road to catastrophe** often begins with failure of proper engineering and proper documentation. Typical process industry catastrophes follow a common path:
 - 2.8.1 Violation of proper engineering and/or failure to maintain proper As Built documentation; this leads to
 - 2.8.2 Failure to create, maintain and follow necessary operating, training, maintenance and inspection procedures; this leads to
 - 2.8.3 A series of process failures, often called “near misses,” in which processes or equipment do not operate properly; unfortunately, management fails to recognize the warning signals of catastrophe and fails to remedy its process safety violations;

2.8.4 Some failure or, more frequently, combination of failures results in a catastrophe such as the Texas City explosion of 2005 or the Deepwater Horizon disaster of 2010.

2.9 Disasters Resulting From Lack of Proper As Built Documentation Include:

2.9.1 Petrobras P-36 Undocumented design changes and lax quality control measures resulted in the inadvertent over pressuring and rupture of a tank onboard the Petrobras P-36 platform. Volatile gases escaping from the ruptured tank ignited and killed 11 workers onboard the platform. Seawater subsequently flooded the support columns causing the \$496 million rig to become unstable and eventually sink to the bottom of the ocean.

2.9.1.1 The investigation report of the P-36 incident recommended that future projects, **“guarantee the units’ documentation is up-to-date** and available both onboard and also with onshore management.” (See P-36 Investigation Report at 31) (emphasis added).

2.9.1.2 The report also recommended to, “Systematize the process for the **management of the changes** to ensure that the project alterations are only implemented after the completion of risk analysis, up-dating of documentation ...” (See P-36 Investigation Report at 29) (emphasis added).

2.9.2 BP Texas City Refinery – Inaccurate procedures and lack of proper engineering documentation led to the overfilling of a tower at the BP Texas City Refinery which allowed hydrocarbons to overflow into an antiquated blowdown drum open to the atmosphere. The overflowing hydrocarbons ignited and the ensuing explosion killed 15 workers and injured hundreds more.

2.9.2.1 Investigations into the incident identified that operators were relying on **out-of-date engineering drawings, incomplete engineering details and incorrect procedures;** all of which were found to be significant contributory factors to the explosion.

2.9.3 BP Thunder Horse – (the sister platform to Atlantis, designed and built by the same companies): Failures associated with the improper installation of the hydraulic control system onboard BP’s Thunder Horse

caused the near sinking of the platform in 2005. The MMS (now BOEMRE) investigated the incident and found multiple failures:

2.9.3.1 It discovered that three check valves in the bilge piping system were installed backwards and one check valve was inoperable; (would have been discovered by proper As Building procedures).

2.9.3.2 The investigation also found a number of MCTs (multiple cable transits) failures due to the MCTs being improperly installed for the configurations they were being used for. MMS findings of the incident identified, as contributing causes, failure to follow PSM procedures, all of which require As Built documentation: "The failure of BP, the operator, to develop standard operating procedures for the isolation of the HPU [hydraulic power units]... Further, the failure of the operator [BP] to perform a HAZOP review of the HPU system..." (MMS EV2010R at 3).

2.9.4 BP Texas City Refinery -- A major fire in the Hydrotreater Unit at the BP Texas City Refinery occurred just four months after the explosion in the Isom Unit that claimed 15 lives. It caused an estimated \$30 million in property damage.

2.9.4.1 Investigation of the incident by the US Chemical Safety Board determined the fire was a result of **improper procedures and documentation** that allowed installation of an inferior piping component during maintenance. Development and implementation of a standard material verification procedure to check for in-kind materials during maintenance would have identified the inferior piping and prevented the loss.

2.9.5 BP Macondo (Deepwater Horizon) -- As thousands of barrels of oil per day were polluting the Gulf of Mexico (GOM), BP engineers were attempting to stop the flow of oil by manually operating the BOP (Blowout Preventer) for the Deepwater Horizon. It took nearly 10 days after the incident for the BP engineers to realize that the **BOP stack plumbing differed from the piping diagrams on which they were relying**. The portion of the BOP that engineers had been attempting to operate was only a 'test' ram. **Not having current As Built drawings** of the BOP significantly delayed the mitigation efforts.

2.9.5.1 BP Vice-President Harry Thierens, who was BP's lead on BOP interventions, stated afterward that he was **"quite frankly astonished that this could have happened."** (Deepwater Report to the President at 138) (emphasis added).

2.9.5.2 Likewise, the forensic examination of the Deepwater BOP, commissioned by the US Department of the Interior found **"not having a complete set of as-built drawings** complicates the process of recreating the BOP stack to the condition that existed pre-incident." (DNV Final Report for USDOJ at 4) (emphasis added).

2.10 Atlantis is On the Road to Disaster – Proper engineering was not done prior to construction, and engineering defects were built into the facility. Some are known, but many other latent defects, not yet recognized, are probably hidden beneath the surface. Accurate As Built documentation does not exist, rendering it impossible to discover defects by review of documentation, or to develop needed operating and inspection procedures.

2.10.1 Necessary Change Is An Enemy – Change occurs to all facilities through deterioration of facilities and must be combated by inspection and maintenance. In Atlantis, change is also planned as it expands with the drilling and connection of additional wells.

2.10.2 MOC. Change is recognized as problematic in a process facility. PSM requires that changed be carefully managed by **Management of Change (MOC)** procedures. But the starting point for MOC is accurate documentation of the existing facility which, for Atlantis, does not exist.

2.10.3 Ironically, BP has misused the MOC process to change its internal standards, requiring As Built documents before start of operations, to allow its violations of those standards. (4/20/09 MOC #PMOC-GC787-ATL-09-0016; Discovery Exhibit No. 17, Todd Deposition; BPEP_ABB_00082892-82895).

2.11 BP's Failure to Learn – *Failure to Learn: The BP Texas City Refinery Disaster*, Andrew Hopkins (Wolters Kluwer, 2008) is a study of failure to follow PSM and the consequences of that failure. It documents numerous warnings of disaster ignored by BP leading up to March 5, 2005 and analyzes why BP failed to learn from past disasters and warnings. It reviews the Baker Report, sponsored by BP itself, which indicted management for fostering a culture of non-compliance, and reports on BP's repeated promises to change its culture.

2.11.1 Much of BP's conduct on Atlantis took place during the "bad old days" before Texas City, the Baker Report and the latest commitment to reform. Unfortunately, more recent evidence shows that "failure to learn" remains the driving mind-set on Atlantis.

3.0 Regulatory Requirements

3.1 Regulations Considered -- Applicable regulatory requirements are contained in 30 CFR Part 250 (Oil and Gas and Sulphur OPERATIONS IN THE OUTER CONTINENTAL SHELF), primarily Subchapters H and I; especially

3.1.1 30 CFR 250.901(d), 914[2002];

3.1.2 30 CFR 903, 905(j)[2006];

3.1.3 30 CFR 802(e)(5).

3.2 API Recommended Practices Adopted by Reference -- Subchapter H and I -- Subparts H and I list specific API Recommended Standards which are incorporated by reference into the Subparts. Compliance with these standards therefore constitutes a regulatory requirement. Of particular interest to this issue are:

3.2.1 Subpart H:

3.2.1.1 API RP 14C;

3.2.1.2 API RP 14E;

3.2.1.3 API RP 14J;

3.2.1.4 API RP 2RD;

3.2.2 Subpart I:

3.2.2.1 API RP 2FPS;

3.2.2.2 API RP 2RD;

3.2.2.3 API RP 2A-WSD;

3.2.2.4 API 14J.

3.3 API Recommended Practices Used With the “Adopted by Reference” -- API Recommended Practices routinely refer to and rely on other API documents to provide more specificity in particular areas. Such additional references, called “second tier” documents by the MMS, are effectively a part of the parent document adopted by reference by the MMS, and compliance with such “second tier” documents was stated by MMS to be a regulatory requirement in its notice of adoption by reference. See 66 Fed. Reg. 66,851 at 66,852 (Dec. 27, 2001). Of particular interest to the issues of this report are:

3.3.1 API RP 17A Encompasses the entire subsea system as referenced in its scope, “the complete subsea production system comprises several subsystems necessary to produce hydrocarbons from one or more subsea wells to a given processing facility located offshore (fixed, floating or

subsea) or onshore, or to inject water/gas through subsea wells.” (API RP 17A at 1). This document is incorporated by reference into API RP 2FPS, which is incorporated by reference at 30 CFR §§250.198 and 250.901.

3.3.2 API RP 75 addresses the identification and management of safety hazards and environmental impacts in design, construction, start-up, operation, inspection, and maintenance of offshore production facilities. It specifies that current versions of relevant documents essential to the effective functioning of the safety and environmental systems be available at all locations. This document is also incorporated by reference into API RP 2FPS.

3.4 Requirements of 30 CFR 250 Subpart I [2006] – Subpart states requirements applicable to “platforms and structures.” Such “platforms and structures” included floating production systems such as Atlantis. (30 CFR 250.900(b)(1)(ii) [2006]).

3.5 Regulatory Requirements under Subpart I include:

3.5.1 Requirement to “design, fabricate, install, use, maintain, inspect and assess all platforms and related structures on the Outer Continental Shelf (OCS) so as to ensure their structural integrity for the safe conduct of drilling, workover and production operations....” (30 CFR 250.900(a) [2006]).

3.5.2 Application Approval -- Submit an application and obtain approval of the Regional Supervisor before installing the platform. (30 CFR 250.900(b) [2006]).

3.5.3 Compliance with Standards -- Plans for platform design, analysis, fabrication, installation, use, maintenance, inspection and assessment must conform to numerous, specifically listed industry standards which are adopted by reference, including API RP 2FPS -- Recommended Practice For Planning, Designing and Construction Floating Production Systems (30 CFR 250.901(5) [2006]), and API RP 14J -- Recommended Practice For Design and Hazards Analysis for Offshore Production Facility (30 CFR 250.901(10) [2006]) . These and the other listed industry standards are adopted by reference into the Regulations, and actually become part of the Regulations themselves. As mentioned above, API RP 2FPS includes, as a second tier document, API RP 17A -- Recommended Practice for Design and Operation of Subsea Production Systems.

3.5.4 As Built -- Compilation and retention of “as built drawings” is required by two sections: 30 CFR 250.903(a)(1) [2006] and 30 CFR 250.905(j) [2006]. Requirements to make As Built standards are contained in API RP 17A:

“all information should be updated to ‘as built’ status and should be available in electronic form.”

(Annex E), and

“integration testing – during integration testing, the subsea production system shall be subject to the following activities:...

(j) a final inspection to verify correctness of the as built documentation.”

(Paragraph 7.3 at Page 46). 30 CFR 905(j) [2006] requires submission of a certification, including the statement that

“the certified design and as-built plans and specifications will be on file at (give location).”

3.5.5 Scope of Subpart I -- There is a dispute between the parties as to whether API RP 17A is applicable to Atlantis and whether Atlantis was required to compile and maintain As Built documents with respect to the subsea system. I am of the opinion that API RP 17A does apply to Atlantis both because it is incorporated in the regulations, and also because it is a standard industry practice which BP should follow with respect to the subsea systems. As a standard industry practice, it is also incorporated as a requirement in BP documents, including the BP Atlantis Specifications Applicable to the Subsea Control System (1440-35-SB-SP-0047 Rev. A; BPEP_ABB_01509097/1509111) which lists these among applicable regulations, design codes and specifications. (Section 4.0, Page 10 of 15). The BP Atlantis Subsea Project Execution Plan (1440-10-PM-RP-0001 Rev. 3; Discovery Exhibit No. 86; BPEP_ABB_00088809/88925) lists, in Section 6.6 (at Page 50 of 117), API-17A as being among the governing Engineering documents which are to be complied with. It further states in Section 6.2, that: “As-built Documentation: the Lead Engineer for each discipline area will ensure that all technical documentation is updated to reflect the ‘as-

built' condition of the equipment prior to deployment to the field.” (at Page 49 of 117).

- 3.5.6 Requirements of 30 CFR 250 Subpart I [2002]** -- BP claims that the regulations in affect in 2002 apply to the Atlantis platform, rather than those in affect in 2005. The 2002 regulations also required that an application be submitted and approved prior to platform installation. (30 CFR 250.900(b) [2002]). That application was required to be submitted under then Section 250.901.
- 3.5.7** Section 250.901(d) [2002] included a requirement that the lessee submit a certification that the engineering design of the platform had been certified by registered professional engineers, and that the lessee be in possession of detailed structural plans containing such certification by registered professional engineers. BP was never in possession of such detailed structural plans certified by registered professional engineers as discussed below and never submitted the certification required under 901(d). Its only Subpart I certification was submitted in 2010 when it was required to submit a certification as part of the BOEMRE investigation.
- 3.5.8** I have not found among the documents any document issued by MMS purporting to approve the Atlantis design prior to the installation of the platform or prior to the effective date of the 2005 amendments. In my opinion, no approval of the plans could have been issued validly because the necessary certification had not been submitted, the necessary certification could not have been truthfully submitted, and therefore, that the applicable regulations are not those in force in 2002, but those which came into force in 2005.
- 3.6** Even though there is a dispute between the parties as to which of the regulations under Subpart I is applicable, and as to whether or not the regulations extend to the subsea systems, it is my opinion that these differences of opinion have no affect on BP's false certification. Both the 2002 and the 2005 regulations clearly required engineering certification and maintenance of As Built drawings with respect to the structural integrity of the floating platform. It is absolutely clear that BP did not comply with those requirements under either the 2002 or 2005 regulations.
- 3.7 Requirements of 30 CFR 250 Subpart H [2006]** -- Subpart H states requirements applicable to “Oil and Gas Production Safety Systems.” Such

“production safety systems” include “floating production systems” such as Atlantis. (30 CFR 250.800(b)).

- 3.8** Regulatory requirements under Subpart H applicable to the “production safety system” include:
- 3.8.1** Requirement that, production safety equipment shall be designed, installed, used, maintained, and tested in a manner to assure the safety and protection of the human, marine, and coastal environments.
 - 3.8.2** **Section 30 CFR 250.800(b)(1) [2006]** requirement that floating production systems comply with **API RP 14J**. This document recommends minimum requirements for the design, layout, and basic hazards analysis (What-If Analysis, Hazard and Operability Study, Failure Mode and Effects Analysis, Fault Tree Analysis, etc.) procedures for offshore production facilities.
 - 3.8.3** Compliance with **API RP 14C (30 CFR 250.803(a))**. API RP 14C outlines the basic concepts of a platform safety system along with protection methods and requirements of the system using SAFE (safety analysis function evaluation charts), SAC (safety analysis checklist), and SAFD (safety analysis flow diagrams).
 - 3.8.4** **Approval of Production Safety System design by MMS** prior to installation of the equipment. (30 CFR 250.802 [2006]). The lessee shall not commence production until the Production Safety System has been approved and a pre-production system inspection has been requested by the lessee. (20 CFR 250.800(a) [2006].)
 - 3.8.5** **Schematic piping diagrams** showing the size and maximum allowable working pressure as determined in accordance with API RP 14E (30 CFR 250.802(e)(3) [2006]) and other specific safety related diagrams and information must be submitted to MMS as part of the Production Safety System Application for Approval.
 - 3.8.6** **Certification** that “the designs for the mechanical and electrical systems to be installed were **approved by registered professional engineers** (30 CFR 250.802(e)(5) [2006]) must also be included in the application for approval. that, prior to installation, the design be submitted to the MMS [BOEMRE] for approval with an application including a “certification”
- 3.9** **Scope of Subpart H** -- It is my opinion that the scope of Subpart H, as defined by API RP 14C (which has been a part of the regulations since 1988) extends to all process equipment from the wellhead to the discharge point downstream of the

process facilities. This express requirement is part of defining the Safety Analysis Function Evaluation Chart (SAFE chart), which is required by Subpart H (Section 250.802(e)(2)) as one of the design documents required to be submitted to MMS as part of the application for approval of the production safety system. API RP 14C specifically requires:

“the SAFE chart should list **all process components**...with their required safety devices, and should list the functions to be performed by each device.”

(API RP 14C, Paragraph 4.3, Page 16) (emphasis added). Further, in Section 4.4 (Analysis Design Procedure Summary, Subsection D), API RP 14C again specifically requires:

“list on SAFE **all process components** and their required devices.”

(emphasis added). In Section 3.4(e), the standard defines “all process components” as:

“ **All process components** on a production platform comprise the entire process from the wellhead to the most downstream discharge point; thus, all process equipment and functions are incorporated into the safety system.”

(API RP 14C at Section 3.4(e), Page 8) (emphasis added). Therefore, under several specific provisions of API RP 14C, which is integrated as a regulation, the SAFE chart required to be produced to MMS is required to list “all process components from the wellhead to the discharge point from the platform.”

3.9.1 BP does not accept this reading of API RP 14C. BP’s representatives have stated that API RP 14C refers to a “dry tree” in which the wellhead and the tree are actually installed on the platform itself, a method that was common years ago in shallow water fixed platforms.

3.9.2 Such a reading of API RP 14C is completely inconsistent with the document as a whole. It is quite clear that the document is intended to apply to underwater installations, as well as dry tree installations. (Table A-1.2 – Safety Analysis Check List Subpart E(b) specifically referring to procedures to be followed in the case of an underwater installation, Page 22).

- 3.9.3 In other places, API RP 14C specifically refers to underwater wellhead flowlines (Figure 12-1.2, Page 20). It also refers to underwater safety valves, and their placement in a practical location in the wellhead flow screen within reasonable proximity to the wellbore. It also refers to a number of types of subsurface safety valves, including the surfaced-controlled subsurface safety valve (SCSSV) which are installed on Atlantis.
- 3.10 As discussed below, this difference of opinion has no effect on BP's false certification. The portions of the facility admittedly under Subpart H had no design approval by professional engineers and had not been As Built, as well as the remaining subsea portions.

4.0 Failure to Comply with Regulatory Requirements Under Subpart I –

4.1 BP is in violation of the Subpart I Regulations in two major respects –

4.1.1 There is no compilation of As Built drawings and specifications for the structure of the floating platform, in violation of 30 CFR 250 Subpart I, and BP's certification to the contrary is false. This is true regardless of whether the 2002 or post-2005 regulations are applicable.

4.1.2 The design of the structure of the floating platform is not certified by registered professional engineers, in violation of 30 CFR 250 Subpart I, and BP's certification to the contrary is false. This is true regardless of whether the 2002 or post-2005 regulations are applicable.

4.2 **2002 v. post-2005 Regulations** – It is my understanding that there is a legal disagreement as to whether the applicable version of the regulations is that which was in force in 2002 or which was adopted effective August, 2005. It is my understanding that BP claims that the 2002 version is applicable.

4.2.1 There are major differences between the 2002 and post-2005 regulations, however, in my opinion, those differences do not affect the falsity of BP's certifications or the fact that BP violated of the licensed engineering certification requirements and the "as building" requirements. Subpart I was expanded, not contracted; the amendments retained (if they did not expand) the requirements for engineering certification of the structural portions of the facility, the duty to compile and maintain certified As Built drawings and specifications, and the duty to make certifications of such facts to MMS; **BP violations are clear regardless of the expansion.** For these reasons, this analysis gives BP the benefit of its legal argument and focuses on the regulatory language as it existed in 2002.

4.3 **On July 21, 2010 BOEMRE issued a request to BP to produce** for BOEMRE's inspection several categories of documents, The request was the result of the complaints by Abbott and Food & Water Watch, and demands for an investigation by Congressional oversight committees. The documents produced by BP provide undisputed evidence of the violations stated above.

4.4 **As Built Documents** – The first category required was those As Built documents required to be compiled and maintained under 30 CFR 250.903(1):

“ A copy (11" x 17") of the "as-built" drawings as required by 30 CFR 250.903(a)(1). These "as-built" drawings should be a complete set of

structural drawings as outlined in 30 CFR 250.905(d) and include a certification statement as outlined in 30 CFR 250.905(k). "As-built" structural drawings should include Each drawing should include the revision history from each phase of the project from design, fabrication, and installation through its current version."

4.4.1 30 CFR 250.903(1) provides:

"§ 250.903 What records must I keep?"

(a) You must compile, retain, and make available to MMS representatives for the functional life of all platforms:

(1) The as-built drawings;"

4.4.2 BP replied by letter dated August 9, 2010, signed by Dr. Simon Todd, VP Thunder Horse, with the statement that Books 1-6 enclosed were in reply to this portion of BOEMRE'S request with the following certification:

"The design of this structure has been certified by a recognized classification society, or a registered civil or structural engineer or equivalent, or a naval architect or marine engineer or equivalent, specializing in the design of offshore structures. The certified design and as-built plans and specifications will be on file at BP's offices in Houston, Texas."

(08/09/10 Todd/BP Letter to BOEMRE, Discovery Exhibit No. 69, BPEP_ABB_00115564/115566).

4.4.3 The certification was false. Books 1-6 contained over 2100 drawings; only 72 drawings (3.4%) were marked or designated "As Built" in any way. Therefore, such documents are not As Builts as defined and required by BP internal specifications:

"4.2 As Built documentation

The Project must ensure that the "As Built" documentation is fully representative of the "As Built" condition of the installed systems. *All "As Built" documentation shall be clearly identified as "As Built" and verified as correct by inclusion of authorized approval signatures. No documents with*

outstanding review shall be submitted as 'As Built' until outstanding review is completed."

(BP Gulf of Mexico Deepwater Development Program, Specification for Data and Information Handover From Projects into Operations, Spec. No. 1400-85-IM-SP-8700 Rev. 1, BPEP_ABB_00115909/115901, Discovery Exhibit No. 88)

4.4.3.1 The MS1 Spreadsheet attached hereto as part of Appendix E details which of the 2100 drawings are and are not labeled "As Builts."

4.4.4 2100 Fraudulent Documents – The submission of 2100 documents not labeled "As Built" but claiming them to be As Built when they were not so labeled, must, under BP standards, be considered as 2100 false statements; each of these documents, when presented as an As Built document, must be classed as an imposter and a fraudulent document.

4.4.5 BOEMRE questioned the lack of As Built designation on the drawings by email dated Aug. 20, 2010, and asked BP to produce its internal specifications containing the definition of As Built drawings. See 08/20/11 email Bryan Domangue to Dennis Sustala:

Dennis:

What, if any, company standard has BP developed that defines "As Built" for engineering drawings. If so, how does your standard compare to industry standards?

(Discovery Exhibit No. 267; BPEP_ABB_01626121).

4.4.6 Although BP had numerous internal standards specifically defining As Built documents, it did not tell BOEMRE about them.

4.4.7 BP internal standards on As Builts document requirements. Among other things, BP specifications require that As Built documents be clearly identified as being "as built." These specifications included:

4.4.7.1 Specification for Data and Information Handover From Projects into Operations, Spec. No. 1400-85-IM-SP-8700; its Section 4.2 requires that "as builts" be "**clearly identified 'As Built' ...**" (Discovery Exhibit No. 88; BPEP_ABB_00115909/115961) (emphasis added).

4.4.7.2 BP Gulf of Mexico SPU Atlantis Engineering Workflow Process, BP Doc. No. 1440-10-GE-RP-1007: "As individual

projects are completed, the documentation is handed over to Operations as outlined in 1400-85-IM-SP-8700, which defines the formats, timing and condition of the documentation as it is handed over to Operations. **As-building is required for the indicated drawings prior to handover.**"

(BPEP_ABB_03500136/3500148) (emphasis added).

- 4.4.7.3 BP GOM DW Projects Document Control Procedure, BP Doc. No. ssproj-10-PC-PR-000001: "This procedure is required for ALL BP DWP Projects." "Upon completion of installation the latest revision of Issued For Construction is **marked up to reflect any constructed changes and issued 'As Built.'**"

(Discovery Exhibit No. 90; BPEP_ABB_01631097/1631120)

(emphasis added)

- 4.4.8 **Dr. Todd's Response was to construct a fictitious** internal standard which would encompass the thousands of fraudulent documents produced to BOEMRE which were not marked "as built" and allow the claim they were, nevertheless, "as built." He responded by email dated August 25, 2010:

4.4.8.1 **"(1) BP's Standard For 'As-Built' Drawings**

BP considers an "as built" engineering drawing to be one that accurately reflects the actual, existing condition or configuration of the system or component that is the subject of the drawing. We believe that this approach is customary in the industry and is used by operators, engineering firms, and regulators." (Discovery Exhibit No. 8; BPEP_ABB_00082845/82851)

- 4.4.9 **This response was false** as shown by a number of facts.

4.4.9.1 **Dr. Todd's reply to BOEMRE omits and is**

contrary to, the clearly stated BP requirement in BP specifications that an "As Built" document must be clearly marked "As Built." Specification for Data and Information Handover From Projects into Operations, Spec. No. 1400-85-IM-SP-8700, Sec. 4.2. (Discovery Exhibit No. 88;

BPEP_ABB_00115909/115961).

4.4.9.2 **Dr. Todd's reply to BOEMRE omits and is**

contrary BP internal specifications on the detailed procedures which are to be followed in creating "As Built" drawings. The

BP Atlantis Project Orientation and Procedures Manual (POPM), Section 4 devotes 21 pages entirely to the required procedures for “redlining” and “as building” drawings, and to itemizing which drawings must be “redlined” and which must be “as built.” “Redline” drawings are marked up in the field with red lines; where “as built” are required, they are made by “re-issuing” redlines “as built.” (Section 4.0, Page 17, Discovery Exhibit No. 87; BPEP_ABB_01453338/01453435).

4.4.9.2.1 POPM gives Mustang responsibility “for completion of the as-builts for all MEI generated engineering documents and drawing ...” and for setting up “as built teams” in Corpus Christi and Morgan City to update drawings from redlines as soon as the drawings are handed over from the prime contractors and the commissioning teams. (Section 4.2.1, Page 17, Discovery Exhibit No. 87; BPEP_ABB_01453338/01453435).

4.4.9.3 Dr. Todd’s reply to BOEMRE omitted the BP requirement that an As Built document was one which had been “reissued ‘As Built’ ,” and failed to inform BOEMRE of the internal BP standards including those requirements.

4.4.9.4 Dr. Todd’s reply to BOEMRE omitted and was contrary to the provisions of the BP Atlantis Integration Project Execution Plan (PEP), Document Number: 1440-25-PM-PR-0004, which likewise provided that Mustang would furnish a team of engineers and technicians to provide services including “producing As-Built” drawings. (Section 4.4, Page 15 of 40; BPEP_ABB_01531656/1531695). The PEP also provided that “As-Built documents will be developed by the respective delivery teams,” and tasked DSME with developing “As-Built drawings for the hull, marine, utility and drilling systems” while making Mustang “responsible for updating and/or developing required As-Built drawings for the topside facilities.” (Section 5.2.4, Page 20 of 40; BPEP_ABB_01531656/1531695).

4.4.9.5 **Rev. 60 and other designations for As Built. Dr.**

Todd also told BOEMRE that various other designations, such as “Rev. 60” used by DSME, were used to denote an As Built drawing. This statement was false and misleading. We have been able to locate no BP document which supports this statement. In fact, BP’s designated corporate representative, Ken DeJohn, testified by deposition that the DSME marking “Rev. 60” was used to show the fabricated condition of the hull as it left Korea, not as it was ultimately “As Built.” DeJohn admitted that many things that were fabricated in Korea had to be changed during the integration of the hull with the Topsides over the 18-month period that the facility was being constructed into its present configuration at Corpus Christi, Texas. (Deposition of Kenneth DeJohn, Pages 41-44). Frank Ragan, also a corporate representative of BP, testified in his deposition that there was an extensive amount of work done on the hull at the integration yard, including almost the entire rebuilding of the fire and gas system. (Deposition of Frank Ragan, Pages 109-114). DeJohn testified that no one actually verified any of the structural drawings after the integration, that they did “walkdown” the P&IDs for the hull and the Topsides, but the structural drawings were all considered As Built after fabrication, rather than after integration. (Deposition of Kenneth DeJohn, Pages 133-135).

4.4.9.6 The fact that DSME was tasked in writing and developing As Built drawings during the integration process, belies Dr. Todd’s statement to BOEMRE that “Rev. 60” was considered “As Built.”

4.4.9.7 Apparently, based on BP’s statement (through Dr. Todd), BOEMRE found there was “no requirement that [As Built] drawings carry the label “as built.” In fact, BP did have such requirements directly contrary to the claim being made by BP that any previously issued drawing, if it reflected the As Built condition, could be considered an “as built” drawing even though not reissued or labeled as such. **Dr. Todd’s response**

constitutes another false statement made to support BP's false claims.

- 4.5 **Certified by Registered Professional Engineers** – Dr. Todd's August 9, 2010 letter certified the design of Atlantis' structure had been certified by licensed engineers. **This, too, was a false statement.** The great majority of the 2100 documents submitted to BOEMRE on August 9 had not been certified by licensed professional engineers; the great majority of the design drawings had no certification of any kind by licensed professional engineers.

- 4.5.1 **30 CFR 250.901(d) [2002]** provided, in its first sentence:

4.5.1.1 “The lessee shall have detailed structural plans as called for in paragraph (b)(1)(iii) of this section and specifications for new platforms . . . certified by a registered professional structural engineer or civil engineer specializing in structural design.”

- 4.5.1.2 Section 250.901(d) then continues:

“The lessee shall also sign, date and submit the following certification:

Lessee certifies that the design of the structure/modification has been certified by a registered professional, structural or a civil engineer specializing in structural design, and the structure/modification will be fabricated, installed and maintained as described in the application and in any approved modification thereto. Certified design and as built plans and certifications will be on file at _____“

- 4.5.1.3 Therefore, BP had two separate obligations under 250.901(d):

- (1) to have the plans themselves “certified” by a registered professional engineer; and
- (2) provide its own certification in the language required by the Regulation to the MMS.

- 4.5.2 **BP was well aware of these requirements as it began it to plan for Atlantis.** On Nov. 21, 2002, Dennis Sustala, Atlantis' Regulatory Compliance Coordinator, wrote an email entitled “The MMS regulations require certification of Platform Design, Plans and Specification by a Registered Engineer:

- 4.5.2.1 “Traditionally, the easiest method of proving that particular

drawings, plans, or specifications were reviewed or prepared by or under the direct supervision of a registered professional engineer has been **through the use of the PE stamp**. It seems **difficult to comply with MMS requirements without use of the PE stamp**. The Atlantis Project should be prepared to stamp drawings and/or identify the particular registered engineers by Name, Title, and PE Registration No. that have certified or supervised preparation of particular designs, plans and specifications.” (Sustala Email; Discovery Exhibit No. 264; BPEP_ABB_00112453/112454) (emphasis added).

4.5.3 Nevertheless, BP made plans for the detailed engineering of the hull and floating structure to be performed by non-engineers located in Korea.

- 4.5.3.1 Korea-based DSME was selected to perform the detailed engineering design on the hull at their facility in Okpo, Korea. (Floating Systems Team Project Execution Plan (6/12/03), 1440-50-PM-PR-100 Rev., Discovery Exhibit No. 262; BPEP_ABB_0011486/111604).
- 4.5.3.2 At the time in question, Korea had no licensed professional engineering program comparable to that in the United States, and DSME could not provide the certification required by MMS regulations. BP understood that DSME could not provide engineering certification stamps because they were not registered professional engineers. (Sustala 2, pp. 104-105)
- 4.5.3.3 BP had previously sought and obtained a waiver of the PE certification requirement for work to be done by Swedish engineers at GVA. But, the MMS waiver and approval of an alternate certification statement was limited to work done by GVA in Sweden, so it could not apply to DSME’s work performed in Korea. (MMS Approval Letter of BP Request for Waiver Re GVA (2/25/02), Discovery Exhibit No. 247, BPEP_ABB_00087025).
- 4.5.3.4 Aware DSME could not provide PE certification stamps, BP considered seeking a waiver from MMS of the PE certification for DSME’s work. However, the amount of work involved in seeking the waiver was substantial, a “project” in itself.

Ultimately, BP decided to not seek a waiver for the DSME work and to not inform MMS about the issue. (Sustala E-mail (3/24/04), Discovery Exhibit No. 265; BPEP_ABB_00110497/110499).

4.5.4 As the result, only a small minority of engineering design drawings for the Atlantis structure were certified by Registered Professional Engineers.

4.5.4.1 For the hull, floating and mooring system, out of 1152 total drawings, only 8 (1%) were certified by licensed PEs (giving credit, due to the exemption, for six drawings produced by GVA). The two drawings actually stamped were for external railings. Thus, **none of the actual structure of the hull and floating system was designed by a Professional Engineer.**

4.5.4.2 For the Topsides structure, almost 100% of Mustang Engineering drawings were initially certified by licensed PEs; however, as the drawings progressed through revisions, many PE certifications were not carried forward. In the end, out of 950 Mustang design drawings, only 600 were certified by licensed PEs for their final revision (63%).

4.5.4.3 Of all drawings in question, out of a total of 2104 drawings, only 608 were certified for their final revision (29%). (See MS2: PE Stamp Stats Books 1-6, attached hereto as part of Appendix E).

4.6 The hazards thus created are discussed in Section 6.0 below.

5.0 Failure to Comply with Regulatory Requirements Under Subpart H –

5.1 BP is in violation of the Production Safety System Regulations in two major respects

5.1.1 The design of the Production Safety System was not completed or approved by registered professional engineers, in violation of 30 CFR 250 Subpart H, and **BP's certifications to the contrary are false.** This is true regardless of whether the 2002 or the post-2005 regulations are applicable, and true regardless of disagreement between the parties as to the extent that Subpart H extends to the Subsea structures.

5.1.2 After the Production Safety System was installed, BP failed to submit a statement to the District supervisor certifying that the new installations were in accordance with the design approved by MMS. This certification is required by the second sentence of 30 CFR 802(e)(5).

5.2 Disputes Which Do Not Affect This Opinion

5.2.1 The parties are in disagreement as to whether the applicable regulations are those in force in 2002 or those which go into effect after the 2005 amendments. For Subpart H, the only change made by those amendments was the addition of API 14J as an adopted industry standard. That change does not affect the facts related to the false certification under 30 CFR 802(e)(5); there was no change of any kind to that certification requirement and **BP's violations are clear regardless of the expansion.**

5.2.2 The parties are in disagreement as to the extent to which Subpart H governs the Subsea portion of the Atlantis facility. Again, that disagreement does not affect the false certification under 30 CFR 802(e)(5).

5.3 30 CFR 250.802(e)(5) (Production Safety Systems) requires "certification that the design for the mechanical and electrical systems to be installed were approved by registered professional engineers."

5.4 As part of its Application for Approval of the Production Safety System, BP submitted 522 drawings by letters dated February 23, 2005, February 25, 2005, August 1, 2005, October 11, 2005, May 4, 2006, May 8, 2006, May 23, 2006 and September 19, 2006.

5.4.1 BP also submitted the following certification with its letter of August 1, 2005: "Per the requirements of 30CFR250, Section 250. 802(e)(5), this document certifies that the design for the Mechanical and

Electrical systems for the Atlantis semi-submersible production unit, South Green Canyon Block 743 were reviewed and approved by registered professional engineers licensed in the state of Texas.” (Part of Discovery Exhibit 251, BPEP_ABB_00084932/84934) (emphasis added).

- 5.4.2** It its February 23 and 25, 2005 letters, BP states that it is submitting the Production Safety System Application “in accordance with 30 CFR Subpart H, Parts 250.800-250.807...” (Part of Discovery Exhibit 249, BPEP_ABB_01598219/1598220; Part of Discovery Exhibit No. 250; BPEP_ABB_00084533/84534). This is reiterated in the August 1, 2005 (Part of Discovery Exhibit No. 251; BPEP_ABB_00084932/84933) and October 11, 2005 (Part of Discovery Exhibit No. 252; BPEP_ABB_00085236/85237) letters. Additionally, in the referenced February and August letters, BP further advises MMS that “BP certifies that that (sic) the designs for the mechanical and electrical systems to be installed were completed under the supervision of registered professional engineers. Maintenance of the system will be by qualified personnel. All design data shall be kept at BP’s Houston, Texas office.”
- 5.4.3** None of the 522 drawings were stamped or sealed by a registered professional engineer.
- 5.4.4** 505 of the drawings were submitted to MMS prior to September 1, 2005. At the time those drawings were submitted, the Texas Engineering Practice Act contained a provision requiring a document issued by a licensed engineer to be sealed: **“A plan, specification, plat, or report issued by a license holder must include the license holder’s seal on the document.”** (Tex.Occ.Code 1001.401(b)). (emphasis added).
- 5.4.5** **It is beyond dispute that the certification was false** when it was made since any licensed engineer who issued the document was required by law to seal it, and no one else was allowed by law to prepare such plans or specifications.
- 5.5 Second Submission During Investigation** – BOEMRE’S request of July 21, 2010 also required BP to produce copies of the drawings it had initially produced in 2005 with its application for approval of the Production Safety System. Todd’s letter of August 9, 2010 transmitted the requested copies in Books 7-8.

- 5.5.1** When copies were submitted to BOEMRE again in 2010, still, *none* of the drawings had been stamped as approved by registered professional engineers.
- 5.5.2** **Effective Sept. 1, 2005, the Engineering Practice Act was amended to limit the mandatory sealing requirement to** “a project to be constructed or used in this state.” “A license holder is not required to use a seal required by this section if the project is to be constructed or used in another state or country.” Tex.Occ.Code 1001.401(b).
- 5.5.3** **Atlantis was constructed in Texas.** The engineering for Atlantis was done primarily in Houston, Texas. Various parts were fabricated in a variety of places around the world. The hull was fabricated in Korea; the Topsides primarily in Louisiana; and much of the subsea equipment was fabricated in Houston. But the fabricated parts were brought together and “integrated” in Ingleside, Texas, on Corpus Christi Bay where, for about 18 months, large crews of workers “constructed” the “integrated” facility.
- 5.6** Notwithstanding the prohibition on the use of “engineer” by non-licensed persons, it is a routine practice of BP and Mustang to use the term for persons who are not licensed engineers. For example, Ken DeJohn has been designated by BP as “Discipline Engineering Team Lead,” “Atlantis Engineering Team Lead,” “Atlantis Topsides Engineering Manager,” “Staff Facilities Engineer” and “Project Engineer” at various times during his career (Personal Resume of Kenneth P. DeJohn, Discovery Exhibit No. 201); Ron Berger has been designated by a “Subsea Systems Engineer,” “Production Engineer” and “Project Engineer” (Resume of Ronald K. Berger, Discovery Exhibit No. 213); Ryan Malone has been designated by BP as “Operations Engineer” and “Subsea Installation Engineer” (Resume of Ryan Patrick Malone, Discovery Exhibit No. 122). DeJohn, Berger and Malone have all testified that they are not licensed engineers. Thus, a document referencing action taken by a person who uses the word “engineer” in their title as part of the Atlantis documentation cannot be taken to refer to a licensed engineer; the only acceptable evidence of licensing is the use of the seal or stamp.
- 5.6.1** Apparently these and other non-engineers have prepared all of the plans and specifications for the Production Safety System.
- 5.6.1.1** Frank Ragan originally testified that he was the “Control Systems Engineer,” but corrected himself that his title was a “Staff Technical Professional.” (Ragan Deposition, Page 35).

Mr. Ragan worked on the Atlantis Production Safety System electronic controls (Ragan Deposition, Page 32), focusing on the controls system and Production Safety System from 2002 through 2007. Ragan was not aware of any written or oral approval of any part of the Production Safety System by any registered professional engineer. (Ragan Deposition, Page 90-91).

5.6.1.2 Specification documents for controls include:

- 5.6.1.2.1** Atlantis Project Vendor Data Requirements for Control System Hardware (05/19/03), 1440-20-IC-VD-5201 Rev. 0, MUSTANG ENG. 000290/295;
- 5.6.1.2.2** Atlantis Topsides Design Criteria (4/26/02) 1400-20-IC-RP-5060-1 (BPEP_ABB_00106136); **includes specifications for API 14C compliant emergency shutdown systems at Section 29;**
- 5.6.1.2.3** BP Atlantis Specifications Applicable to the Subsea Control System (12/20/01), 1440-35-SB-SP-0047 Rev A (BPEP_ABB_01509097/9111);
- 5.6.1.2.4** BP Atlantis SPCU System Design Specification (12/12/2003), (BPEP_ABB_01397799/7839);
- 5.6.1.2.5** BP Well Systems Integration & Design Engineering Functional Design Specification for the Master Control Station / Subsea Control Unit (Subsea Production Control System) (1/5/02) 1440-35-SB-SP-0030 Rev A (BPEP_ABB_01465756/5840);
- 5.6.1.2.6** BP Gulf of Mexico Deepwater Development Program Site Integration and Commissioning (SIC) Procedure for Atlantis Subsea Master Control Station (MCS) Subsea Control Unit (SCU) and Topsides Interface Project (4/10/07), 1440-35-SB-SP-3033 Rev 0 (BPEP_ABB_03442830/2864);
- 5.6.1.2.7** BP Well Systems Integration & Design Engineering Subsea Controls Commissioning Procedure Downhole Flow Control Production Tree w/o EVP (6/22/07), 1440-35-SB-PR-0179 Rev A (BPEP_ABB_03476285/6397).

- 5.6.1.3** None of these specifications are stamped as PE issued. Item 5.6.1.2.1 was issued by Ken DeJohn and Lynn Osborn, who have testified they are not professional engineers.
- 5.6.1.4** The specifications for the emergency shutdown functions of the Production Safety System, and the controls of the subsurface valving, including the SCSSVs, were not issued by PEs in violation of 30 CFR 250.802(e)(5).
- 5.6.2** The SAFE chart, one of the critical documents required by Subpart H and API 14C (adopted by reference), shows that the engineer involved was Frank Ragan, although he is not an engineer. It shows that it was approved, for most of its revisions, by Lynn Osborne, although Lynn Osborne is not an engineer. On its last revision, the SAFE chart shows approval by Ken DeJohn, although he is not an engineer.
- 5.6.3** BP seems to be taking the position that the designs for the Production Safety System were “approved” by Mustang Engineering as a “registered engineering company.” However, a “registered engineering company” is not an engineer, does not have a seal and is not entitled to perform engineering work as an engineer. As discussed above in Section 2.5.8, such companies may practice only through licensed engineers. “Approval” of an engineering drawing clearly constitutes the practice of engineering; it involves application of engineering skill and judgment, it provides an engineering opinion, it constitutes the evaluation of the drawing for engineering usage, it is part of the development of plans and specifications, all of which constitute the practice of engineering. (Tex.Occ.Code. 1001.003(b)&(c)).
- 5.6.4** In short, no professional engineer has ever sealed or otherwise “approved” any part of the Production Safety System, and BP’s certification to the contrary is false.
- 5.6.5** **Second Certification** – 30 CFR 802(e)(5), in its second sentence, required BP to certify to MMS that the Production Safety System as installed was in compliance, certifying that the new installations conformed to the approved designs.
- 5.6.5.1** In order to comply with this requirement, it would be necessary for BP to obtain As Built drawings for the mechanical and electrical systems of the Production Safety System.

5.6.5.2 BP internal specifications give detailed requirements for which portions of the construction must be As built for regulatory reasons, including P&IDs and drawings of the Production Safety Sytem.

5.6.5.3 MS4 attached hereto as part of Appendix E is taken from Books 7-8 of the Todd Production to BOEMRE made on August 9, 2010. In this production, BP was producing the same drawings which it had produced as part of its Production Safety System Application in 2005-2006, including any updates which had occurred during the interim. MS4 shows the total number of drawings submitted and those which were marked with PE stamps and As built.

5.6.5.3.1 In summary, *none* of the drawings bore a PE stamp.
129 out of a total of 543 (23.8%) were marked As Built.

5.6.6 **BP never filed the required “second certification.”** It could not truthfully have done so, both because

5.6.6.1 There were no designs approved by PEs to comply with, and

5.6.6.2 It did not As Build the Subpart H systems to check for compliance to pre-existing drawings.

6.0 What difference does it make? Criticality of BP Violations

6.1 Under Subpart I – Design: No part of the hull and floating structure of Atlantis was designed by registered, professional engineers.

- 6.1.1 Even the six drawings by GVA based on GVA's "philosophy" for the structure were not designed by registered professional engineers, but by persons with an exemption from the requirement.
- 6.1.2 **1100 Fraudulent Drawings** -- The remaining drawings for the hull and floating structure (over 1100 drawings) were not designed by registered professional engineers or anyone with an exemption, and must be considered false and fraudulent.
 - 6.1.2.1 BP argued to BOEMRE that the lack of professional engineering involved was no problem because of the ABS verification. In fact, during the 2002 time period, BP had asked ABS if its verification would constitute the equivalent of a certification by professional engineers, and ABS replied that it would not. ABS explained to BP that its "verification" was limited to certain specific issues raised in a certain specific section of the regulations and that it could not replace the requirement for certification by a professional engineer.
 - 6.1.2.2 Apparently, BP and ABS discussed the possibility that BP would employ ABS to review and stamp all of the documents for a fee. No such agreement was reached.
- 6.1.3 The nature of the defects, which may be found, is difficult to predict, but the likelihood that so many drawings of such critical equipment could be prepared without mistakes by people who are not qualified engineers is miniscule.

6.2 Hull and Floating Systems – Construction –

- 6.2.1 **2000 Fraudulent Drawings** – Out of 2104 total drawings for the hull, floating system, mooring system and Topsides, only 72 were As Built. The remaining drawings, totaling more than 2000, must be considered fraudulent drawings for being presented with the claim they were As Built when, in fact, they were not. This constitutes over 95% of the total number of drawings for the hull and Topsides; over 98% for the Topsides alone and about 95% for the hull.

- 6.2.2 If, in fact, the design was flawless, the fact that 95% of the fabrication and construction was not checked for compliance with the design makes it almost impossible that there were not changes made during construction which have never been reviewed or approved by anyone with engineering expertise. Again, the likelihood that this has been done without the introduction of significant defects is miniscule.
- 6.2.1 The process for developing As Built drawings is more than a process of making lines on paper and updating drawings. It is a process in which the actual construction is either verified to comply with the design or to depart from the design. It is the verification that the design has been complied with, or it is documentation of what changes have been made. In other words, the As Building process is a critical part of catching, and providing an opportunity to correct, flaws in the construction of the facility. When the As Building is not done, this means that the critical part of examining the construction to be sure it conforms to the design, has not been done.
- 6.2.2 As discussed above, DeJohn admitted that many things that were fabricated in Korea had to be changed during the integration of the hull with the Topsides over the 18-month period that the facility was being constructed into its present configuration at Corpus Christi, Texas. (Deposition of Kenneth DeJohn, Pages 41-44).
- 6.2.3 Frank Ragan, also a corporate representative of BP, testified in his deposition that there was an extensive amount of work done on the hull at the integration yard, including almost the entire rebuilding of the fire and gas system which did not function correctly. (Deposition of Frank Ragan, Pages 109-114). DeJohn testified that no one actually verified any of the structural drawings after the integration, that they did "walk down" the Prides for the hull and the Topsides, but the structural drawings were all considered As Built after fabrication, rather than after integration. (Deposition of Kenneth DeJohn, Pages 133-135).
- 6.2.4 It is almost certain that there were many changes made due to mistake or error which have never been reviewed or approved by anyone; this is simply the nature of the construction process.
- 6.3 **It is highly probably that hidden defects in the structure will become apparent in a most tragic way sometime during the life of this facility.**
- 6.4 BP attempts to justify the fact that DSME personnel were not qualified as professional engineers by testifying that the "philosophy" of the hull design was

laid out by GVA in Sweden, and that only the “detail” design was done by DSME. Detail design, however, can be extremely critical. Machinery does not operate based on philosophy. Machinery operates based on physical principles, many of which are involved in small details. If someone making a mathematical calculation of the strength necessary for the hull makes a mathematical error on the detail, the vessel may fail to withstand Category 5 hurricane force winds and seas and may sink due to inadequate strength of the hull. A detail – but one which is potentially fatal.

- 6.4.1 In 2005, BP Thunder Horse, Atlantis’ sister vessel, also designed and fabricated by DSME, nearly sank following Hurricane Dennis due to improper installation of drain pipes intended to drain the bilge out through the hull. The drains were installed backwards, so that when the drain holes were under water during heavy seas, they allowed water to drain in, not out. This was a failure of detail which may have occurred during the process of creating the design, or may have been not found because the construction was never As Built. In either case, this detail almost sank Thunder Horse.
- 6.4.2 The Space Shuttle Challenger exploded in flames January 28, 1986 because of a faulty O-ring seal, which allowed hot gases from the shuttle solid rocket booster to weaken the external propellant tank and strut that held the booster to the tank, causing failure of the tank aft region. A small detail, but fatal to the space shuttle and its occupants.
- 6.4.3 The Space Shuttle Columbia burned up on re-entry February 1, 2003, fatally injuring all of its occupants when a small piece of foam insulation broke off of the external tank during launch. It struck the left wing edge, causing damage to the thermal protection system, which is what shields it from the extreme heat caused from friction in the atmosphere during re-entry. A small detail, but fatal to the space shuttle and its occupants.
- 6.5 **Defects Under Subpart H** – In my first report on this case, attached as an Exhibit to the Amended Complaint, and attached hereto hereto as Appendix G-2, I raised the concern that the safety shutdown logic drawings were unapproved. That concern has been validated.
 - 6.5.1 **Major defects in the controls system have been apparent since before the beginning of production of oil and gas.**
 - 6.5.2 This is not surprising since, as late as January 2007, Frank Ragan, head of the controls team, was writing that there was *no specific design for where*

some of the software would reside, and he was not aware of any issued document which formed the basis of the design and the foundation for future changes. He added that some document defining what software was used, by whom and for what purpose, was needed. (BPEP-ABB-03498616) (emphasis added). Another BP manager commented that “most of us are not literate enough on software to actually understand the changes being made and their impact.” (BPEP-ABB-03498616) (emphasis added).

- 6.5.3 I have noted previously that none of the Production Safety System design has been reviewed or approved by any licensed professional engineer, that the specifications for the controls system do not appear to have been issued by a professional engineer, and that the individual who was apparently the head of the control design team and the Production Safety System design team for Atlantis was a Mr. Frank Ragan, who is not an engineer.
- 6.5.4 Non-engineer Ragan has testified that the safety shutdown logic functionality which is required as part of the Production Safety System is contained within the SAFE chart. (Deposition of Frank Ragan, Page 97). As mentioned earlier, this critical document shows that its engineer was Frank Ragan (although he is not an engineer) and that its approval was by Lynne Osborn and Ken DeJohn (also not engineers).
- 6.5.5 At many locations, the SAFE chart references P&IDs which provide the schematic environment in which the components mentioned are located. Oddly, at least four P&IDs referenced by the SAFE charts as submitted to MMS did not exist at the time the SAFE charts were submitted. The first SAFE chart was submitted on February 16, 2005; and an amended SAFE chart was submitted on September 18, 2006. Both of these SAFE charts referenced P&IDs numbers 167-0004, 167-0011, and 671-5002. The drawings earliest dates are in October, 2006.
- 6.5.6 It may be no surprise that the non-engineers failed to understand the requirements they were to meet in creating the SAFE chart. API RP 14C specifically requires:
 - “The SAFE chart should list all process components and Emergency Support Systems with their required safety devices and should list the functions to be performed by each device...the relation of each safety

device with its required function can be documented by checking the appropriate box in the chart matrix.”

(Section 4.4.3).

- 6.5.7 Notwithstanding the requirement to list all process components, the safe chart prepared by Ragan, Osborn and DeJohn omitted critical subsea valves which regulate, control and contain the process flow, including the subsea tree PIV, choke, CXV, XOY, AMV, AWV, and DXV. The correct positioning of these valves required to keep the process flow contained within the production tubing (XOV), to allow the opening of the annulus for certain purposes at certain times (AMV) and to regulate, control or shut off process flow (choke valve). By omitting these devices from the SAFE chart and its logic, Ragan, DeJohn and Osborn apparently omitted to include these devices in the software control which they were designing.
- 6.5.8 The failure to include the subsea valves as part of the SAFE chart, and therefore, as part of the logic submitted to the software developers may be related to a mysterious failure that plagued the control systems for months – the mysterious opening and closing of tree valves, including the AMV and XOY valve.
- 6.5.9 As discussed below, routine and well-recognized requirements for process controls systems and critical automated systems, are not present on Atlantis and seem to have never been specified as requirements. This is probably the result of lack of PE control and direction of the design process.
- 6.5.10 **As a process safety engineer, I am very familiar with the use of automated control systems, which are routinely used in virtually all process facilities to manage and control the process.** Such systems receive continuous data inputs and can alter equipment settings to respond to changing conditions far more rapidly and more accurately than human operators; such controls systems include very rapid automatic shutdown capability if conditions require. Such systems must operate continuously for long periods of time and must be designed and constructed to be essentially “fail-proof.” Atlantis requires an equal, if not better, critical controls system.
- 6.5.11 **Such a critical system should obviously be designed from the beginning as a “mission critical” system in which failure in not an**

option. Engineering specifications and testing should include those requirements. Design of the system should obviously include the design of an environment suitable to house the computerized equipment; software function should be carefully planned on an engineering basis, followed by rigorous and thorough testing of hardware and software substantially in advance of startup so that any problems, malfunctions or other “bugs” could have been found and eliminated. It is obvious from the results that this was not done on Atlantis.

- 6.5.12 When BP began to produce the cascade of e-mails recording the controls malfunctions and loss of control events, I recommended to Plaintiffs’ counsel that they retain the advice of someone more skilled than I in the details of software and software reliability. I have now learned that counsel did retain Mr. Jarod Jenson of the firm of Aeysis, Inc. I have read Mr. Jenson’s report and find it very enlightening and helpful. Many of the general principles in Mr. Jenson’ report are exactly the kind of thing that would have been understood and implemented by a registered professional engineer. However, perhaps the most particularly insightful comment made by Mr. Jenson is that pertaining to the “lackadaisical” attitude exhibited by BP management to the long-running and multiple list of its control failures. The realization that it took four years to obtain a root cause analysis of the failure of the SBC on a critical system seems incredible. Yet, in situation after situation after situation involving many different aspects of the platform, we see a similar lackadaisical attitude exhibited towards well-known safety engineering requirements. The disregard of the requirements for design to be performed by qualified engineers and for the products of construction to be documented in As Built documentation are glaring examples. BP management has exhibited the ability to write detailed procedures which create perfectly acceptable and perhaps, outstanding, procedures to achieve safety. Another arrived just today, in which we received through production *another* BP document requiring that data be clearly identified if it is to be considered As Built. BP Atlantis Controls Vendor Data Requirement Re: As Built, MUSTANG ENG 000290, BP Document No. 1440-20-IC-VD-5201, approved by Frank Ragan, Ken DeJohn and Lynn Osborn.
- 6.5.13 Yet, BP personnel exhibit an apparently unlimited capacity to heedlessly disregard these requirements. They repeatedly are “running their own red

lights.” A major part of engineering training is to learn how to make careful judgments about what procedures are required – AND THEN TO FOLLOW THOSE PROCEDURES. Professional engineers do not run their own red lights, and do not allow those working under them to do so. This is one of the critical safeguards lost by dispensing with licensed engineers.

- 6.5.14 **After Ragan, Osborn and DeJohn omitted critical subsea valves from the SAFE chart, and therefore from the software logic, the controls – beginning almost immediately with first production – began to engage in a startling and long-running series of multiple malfunctions, resulting in multiple events in which control of the well was lost.** The controls system has produced multiple malfunctions resulting in multiple loss of well control events. These events are indicated by a volume of emails summarized in Appendix F, attached hereto. The malfunctions began prior to the beginning of production when the controls system shut down the generators during startup (9-22-07; BPEP_ABB_03502155-2157); the email traffic shows these malfunctions continued more or less continuously through 2008. There are only intermittent records dated after 2008, but they do not reveal a determination of the cause(s), solution(s) for most of the malfunctions, implementation of the solutions or provide any detail on the current state of affairs. One of the most recent, dated in Dec. 2010, reveals the latest in a long series of SCB failures. (12/15/10; BPEP_ABB-02176312-6317).
- 6.5.15 The malfunctions seem to fall in roughly the following categories:
- 6.5.15.1 SBC crash/shutdowns – this has the only root cause determination; cabinet temperature and other issues (**Root Cause Analysis; 5/12/10; BPEP_ABB_01930185-0210**);
 - 6.5.15.2 Tree valves opening and closing uncommanded;
 - 6.5.15.3 Uncommanded well shut-in events – (8/19/08: DC 113, 114, 122; 8/10/08);
 - 6.5.15.4 Choke: failure to open/close as commanded;
 - 6.5.15.5 Choke FAM: failure to function – DC 112, 113, 114, 143 (10/5/07; 1/9/08); DC 123 (11/6/08);
 - 6.5.15.6 Partial or intermittent loss of data communication with wells;
 - 6.5.15.7 Total loss of comm. w/ DC 111, 112 from 7/29/08 through 8/1/08 (8/4/08);

- 6.5.15.8 Uncommanded generator shutdowns;
- 6.5.15.9 Operator screens present inaccurate situational picture;
- 6.5.15.10 Transmitter failures threatening large overflow of the sump;
- 6.5.15.11 Multiple SmartTool malfunction;
- 6.5.15.12 Multiple SPCU malfunctions;
- 6.5.15.13 Improper SEM times;
- 6.5.15.14 Valve leakage;
- 6.5.15.15 Downhole gauges not reporting;
- 6.5.15.16 Large quantity of network errors related to fastscan server;
began following Hurricane Gustav (9/22/08);
- 6.5.15.17 Wells involved over the period of time included at least 10 of
Atlantis 12 wells:
 - 6.5.15.17.1 DC 111
 - 6.5.15.17.2 DC 112
 - 6.5.15.17.3 DC 113
 - 6.5.15.17.4 DC 114
 - 6.5.15.17.5 DC 121
 - 6.5.15.17.6 DC 122
 - 6.5.15.17.7 DC 123
 - 6.5.15.17.8 DC 124
 - 6.5.15.17.9 DC 142
 - 6.5.15.17.10 DC 143
- 6.5.15.18 A need for ability to shut-in individual wells to protect the
completions was voiced (Berger, 1/10/08);
- 6.5.15.19 Oil leaking into annulus (6/19/08); apparently related to the
controls cycling tree valves, including the XOM, without
command;
- 6.5.15.20 SEMs powered down by BP personnel due to unreliability; this
and other actions such as shutting off alarms is a process of
disconnecting defective safety features of the system for ease
of use;
- 6.5.15.21 Need to run DC 122 blind due to SEM-A not available and
need for DC 121 Test Bridging (11/27/08); and
- 6.5.15.22 Sustala Email to MMS – Comm loss re DC 111, 112 –
Reestablished (8/4/08); **no further communications issues**;
actually had occurred in March on DC 121, 122.

- 6.5.16 The information that the controls systems are not working, and that operators are allowed to manually disconnect portions of the communications links, or to turn off alarms because they are disruptive, is eerily reminiscent of the period of time which preceded the March 5, 2005 Texas City Refinery disaster. In that event, control systems did not work properly, data sensors did not work properly, alarms were turned off because they were annoying, operating procedures were out of date, and disaster was the result.
- 6.5.17 The opening, closing and cycling of well valves is not a minor matter. It represents loss of control of the flowing well, with all of the flammable and explosive oil and gas under pressures in the magnitude of 5000 psi. If the critical valves cannot be controlled, the well cannot be controlled. One of the valves which opened repeatedly was the XOV; this is a valve which opens to connect the production tubing containing the flowing production under high pressure to the annulus, which is a space between the production tubing and the casing. Opening such a valve while the tubing is under high pressure can instantly fill the annulus with oil and gas under pressure which may be severe enough to create an annulus overpressure condition which can burst the outside casing and result in a blowout of the well, or collapse the inner casing and ruin the well. We have emails indicating that such a leak of oil into the annulus occurred on one well, although we do not have identification of the well or the cause of the event.
- 6.5.18 Well 313 is shut in due to "mud" leaking through the surface casing. Documents indicate leakage of drilling fluid through the cement port closure sleeve of the wellhead (4-29-2010; BPEP_ABB_03448519). We have not been able to locate any consideration to possible annulus overpressure problems due to the controls as a contributing factor.
- 6.5.19 There is apparently no corrosion monitoring being done in jumpers and flowlines by smart pigs. Given the harsh conditions, it would seem prudent to perform such monitoring routinely. Failure to do so is recognized as one of the causative factors of the Alaska pipeline leakage.
- 6.5.20 It is my opinion that if normal licensed professional engineering judgment had been used for the specifications for the control system, appropriate precautions for environmental conditions would have been taken, thorough testing and rigorous control of software design would have been included, the types of failures that have been reported would not have

occurred. In my opinion, a licensed professional engineer, if not personally an expert in controls, would have obtained the services of someone such as Mr. Jenson, who is highly knowledgeable and experienced in the design of highly critical computerized systems.

6.5.21 At the same time that BP management insists that all drawings are in place and everyone has access to all the information they need, we find e-mails like one dated December 9, 2009, Page 2 of 14, commenting that the drawings do not match the delivered equipment; FMC never received updated drawings for approval; nameplate does not contain the revision number of the part as required. And another, dated March 8, 2010, in which BP has found that it has different electrical flying lead designs, one by FMC and another by Technip, and personnel cannot determine which are in use at which locations. The e-mail is attempting to find out where the installation information can be located so that they can establish what hardware is in use at what location. For example, another e-mail dated April 20, 2010, at the same time that BP is telling BOEMRE that all documents are readily available to operations through Documentum and through the use of SPF. Barth Roades writes to Ron Berger and Bill Broman, "What's the schedule for getting the documents so that we can search and access from SPF. All of our guys use SPF for searching drawings and currently have no access to the subsea info w/o currently having to log into Documentum separately." And "I went to out to Documentum in the Deepwater Development folder and found where the subsea drawings are located. Very difficult to find what you are looking for." (BPEP_ABB_00115761).

6.5.22 In fact, the information provided by BP to BOEMRE about how the handover packages were complete and provided to Operations with all information needed by the time equipment went into service was false. Attached as MS7 to Appendix E hereto, is a spreadsheet showing the equipment related to Well DC111 on October 6, 2011, the date of first oil, which was produced through this well. The items marked in red are items which should have been existing and included at the time of the Handover Package, but were not. To take the first line, the P&IDs for the tree were not handed over in the Handover Package, they were not As Built at the time of first oil, they were not approved by an engineer at the time of first oil, they are not As Built as of today, and they are not approved by an

engineer as of today. To take the next line, the mechanical drawing for the same tree was not in the Handover Package, was not As Built at first oil, was not engineer-approved at first oil, is not As Built now and is not engineer-approved today. With respect to the Manifold – at the time of the first oil, the Manifold P&ID was not handed over; the drawing date does not indicate the drawing existed prior to first oil; it was not As Built at first oil; it was not engineer-approved at first oil; it does show to be As Built now, but not approved by an engineer. On January 10, 2008, when Technip provided “all” subsea material to Tinikka Curtis, the Manifold 1 P&ID was not among the material provided. A glance at the chart will show that many of the mechanical, electrical and safety items required to be handed over were not, that many of them have still not been upgraded to As Built status and most, are not engineer-approved.

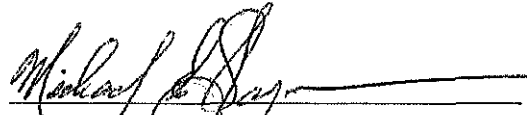
- 6.5.23 The Tree P&ID for Well DC113 was drawn on October 6, 2008 (Discovery Exhibit No. 129) almost exactly one year after the well went into production on October 11, 2007.
- 6.5.24 In fact, there are numerous internal BP specifications dealing with As Built drawings. They require that As Builts be so marked; they require that As Builts be reissued from previous documentation; they require that As Builts be completed prior to handover so that they may be handed over to Operations at the time of handover. This widely has not been done on Atlantis, and BP Management continues to exhibit a lackadaisical attitude toward the safety issues involved, and a cover-up attitude when the facts are brought into the public light.
- 6.5.25 Atlantis Records Management Project Execution Plan (PEP), Document number 1440-10-AD-PR-0005, MUSTANG ENG 000205, provides that engineering technical documents were to be checked by Projects Records Management before being transmitted to BP’s Documentum; in checking the documents, Records Management was to assure (1) that the documents were signed/approved, original drawings (2) the current revision number, date and reason for revision were on the original documents, and that “if any information is missing or incorrect, the Project Records Management Team will return the engineering technical document to the Discipline Leads to fix.” (Section 4.1). This is precisely what Kenneth Abbot was attempting to do. He was attempting to return to the Project Leads a large

body of incomplete engineering documents. They were incomplete because the engineering had not been done.

- 6.5.26 At the same time that BP continues to argue that the requirements for As Building do not apply to things like P&IDs and such safety documents, its own Atlantis Records Management Project Execution Plan, Document 1440-10-AD-PR-0005, MUSTANG ENG 000205, as previously referenced, points out in Section 6.8 that As Building is a specific regulatory requirement under the MSS regulations for P&IDs, 14C flow diagrams, SAFE charts, ESV schematics, area hazardous classifications and numerous other documents related to the Production Safety System, including the SAFE charts, most of which are neither engineer-approved nor As Built as of the present time.
- 6.5.27 The BOEMRE Report disparages Abbott's information which he initially provided to the Government. Depositions in the case, however, now confirm that most of his information came either from e-mails such as that issued by his predecessor, Barry Duff, just before Abbott arrived on the job or from the DC1 Closeout Report Excel Spreadsheet prepared by Mr. Duff. Mr. Duff has confirmed that the spreadsheet was prepared for the purpose of trying to get the documents finalized and closed out, a fact which BP apparently denied to BOEMRE.
- 6.5.28 With the actual documents now available to use from discovery through the BP Documentum, I have compared Mr. Duff's spreadsheet, which Mr. Abbott provided to me and to the Government at the beginning of this case, and found the correlation between it and the actual documents is approximately 95%. In other words, there is virtually no difference and no change between the body of documents reported and relied on by Mr. Abbott and that which exists today.

The above report is based on information available to me until this date. We have requested further detailed information, including a deposition of a BP representative on Controls. Neither the deposition or the other information has been provided by BP. I reserve the right to amend and supplement this report when further information is received.

Signed this 14th day of October, 2011.



Michael E. Sawyer, P.E., CSP

Appendix A

APPENDIX A

Michael E. Sawyer

Personal Background, Education and Experience

PERSONAL BACKGROUND

Michael E. Sawyer is a resident of Texas and has lived in the Clear Lake area of Houston, Texas for the past 21 years. He has two sons who also reside in Texas. His eldest son works in the oil and gas industry and his youngest son recently finished his undergrad degree and is preparing to enter law school.

Mr. Sawyer is a graduate of Texas A&M University and has supported the University through on-campus lectures and presentations at University sponsored conferences in his spare time. In addition, Mr. Sawyer has represented Texas A&M at training events in India and Malaysia. He has established two scholarships at the College of Engineering for students pursuing safety engineering related studies. He continues to work with graduate engineering students at A&M's Center for Process Safety.

After several years in industry working as a safety engineer, Mr. Sawyer began a private process safety engineering consulting practice in 1994. Through his private engineering practice he has conducted projects throughout the world with major Engineering and Construction firms, Oil and Gas processors, and operating companies.

EDUCATION

- Bachelor of Science, Safety Engineering, Texas A&M University, 1983
- Associate in Applied Science, Fire Science, Wilson Technical College, 1978
- Associate in Arts, Liberal Arts, College of the Albemarle, 1976

PUBLICATIONS, INVITED PAPERS AND MANUSCRIPTS

1. OSHA 1910.119: PSM, Its Effect on Engineering Design Projects
2. Comparison of Chemical Hazard Analysis Models
3. Screening Analysis Techniques, Risk Assessment & Risk Management (book - chapter author)
4. Safety Analysis of a Typical Shutdown System
5. Hazard Evaluation Procedures Handbook (book - peer reviewer)
6. Safe Equipment Location with Hazard Analysis
7. Consequence Analysis for CAAA Risk Management Plans
8. Risk Assessment as a Basis for Addressing Process Hazards

9. Application for Development of Worst Case Scenarios
10. Worst Case Scenario Development for Off-Site Consequences
11. Process Hazard Analysis Protocol
12. Environmental, Health & Safety: A Systemic Approach
13. The Next Generation Process Hazard Analysis Protocols
14. Safety & Environmental Management Program Certification
15. Loss Prevention in the Process Industries, 3rd Edition, Chapter 8 (book – chapter editor/author)
16. Are You Bypassing Process Safety Programs?
17. LOPA Lessons from Past Process Plant Incidents
18. Refrigeration System exHAZOP
19. Process Safety Programs: Proactive, Not Reactive

EXPERIENCE

Mr. Sawyer is a licensed Professional Engineer registered in the State of Texas and the State of Massachusetts. In addition, he maintains a designation of Certified Safety Professional (CSP) in system safety aspects. He has over 28 years of experience ranging from industrial safety applications to detailed analyses of highly complex process units and systems. His expertise includes applications relating to loss control/loss prevention, hazard analysis, risk assessments, and litigation support.

As an experienced process safety engineer, Mr. Sawyer has appeared on interviews and programs by CNN, BBC, Frontline PBS, CBS National News Network, National Public Radio, and Houston NBC News Affiliate. In addition, he has been referenced and quoted in numerous national and international newspapers and professional journals.

His previous experience with BP has been through investigation and trial testimony of the 2005 Texas City Isomerization unit explosion that killed 15 people and investigation of a July 2006 contractor fatality at the same refinery. Mr. Sawyer also prepared reports that opined on BP's failure to comply with their OSHA settlement agreement as well as reports on the progression of a third party audit of the Texas City Refinery.

The greatest span of Mr. Sawyer's career has been in the area of process safety for the oil and gas industries. He has facilitated numerous hazard analysis and risk assessment studies of refining and petrochemical facilities throughout the US and the world. His international process safety projects include studies in Japan, Canada, India, Venezuela, Chile, Argentina, Mexico, Saudi Arabia, Australia, Singapore, and Malaysia.

Mr. Sawyer's experience also includes support of the development and implementation for proactive process safety programs. Paramount to the

development of these programs is document control and management of design changes. In addition, He has facilitated numerous audits of process safety programs and conducted detailed evaluations of engineering design documentation and management of design changes.

Throughout his career, Mr. Sawyer has amassed significant downstream process experience, such as analysis of process designs beginning with front end engineering design and continuing through to final assessment and hazard analysis of the "approved" design. This experience has included projects such as world-scale ethylene production facilities, ammonia processing plants, and marine export terminals for oil and gas.

Mr. Sawyer's broad-based process safety experience also includes upstream projects. [In the process industries, "upstream" refers to exploration and production, while "downstream" refers to refining and marketing.] Mr. Sawyer was selected to lead hazard and operability (HAZOP) studies for Pemex GOM facilities, Shell Exploration and Production, Shell Venezuela, Petrolera Zuata (Petrozuata Venezuela), and Chevron's Tombua-Landana platform. Mr. Sawyer's upstream experience also includes leading hazard identification (HAZID) studies for Shell Exploration and Production and risk assessments for PDVSA (Petróleos de Venezuela S.A.).

Appendix B

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
1	Microsoft Word - 3478-BPM-RA-0001 Project Execution Plan Rev 3.doc	AB0006585	AB0006701
2	BOEMRE Report Ex. 12: Recommended Practice for Design and Hazards Analysis for Offshore Production Facilities	FWW0011046	FWW0011135
3	1440-30-SB-PR-463 Rev 0 (approved for use) Exhibit 04.pdf; Atlantis Subsea Project System Handover Procedure	BPEP_ABB_00000059	BPEP_ABB_00000067
4	1440-20-HS-RP-6009A Rev 0 (issued for approval)	BPEP_ABB_00004808	BPEP_ABB_00004836
5	1440-20-HS-RP-6009 Rev Final (final issue)	BPEP_ABB_00004837	BPEP_ABB_00005956
6	Topside Fire Hazard Assessment 1440-20-HS-RP-6013 Rev 0 (issued approved).pdf	BPEP_ABB_00006230	BPEP_ABB_00006417
7	Atlantis Subsea System Hazop Study 1440-30-HS-RP-0065 Rev 1 (issued for approval)	BPEP_ABB_00007013	BPEP_ABB_00007699
8	1440-30-HS-RP-0103 Rev A (issued for comment)	BPEP_ABB_00007700	BPEP_ABB_00007778
9	Subsea Tree IWOCs Installation HAZID analysis 1440-30-HS-RP-0211 Rev A (for review & comment)	BPEP_ABB_00007875	BPEP_ABB_00008108
10	Atlantis Subsea Phase 1 (SS1) Hazop Report 1440-33-SB-PR-0128 Rev 0 (construction)	BPEP_ABB_00008298	BPEP_ABB_00008340
11	Flowline and Riser Installation Hazid Report 1440-37-HS-RP-0263 Rev A (issued for information).pdf	BPEP_ABB_00008431	BPEP_ABB_00008545
12	1440-50-HS-RP-0005 Rev 0 (approved)	BPEP_ABB_00009474	BPEP_ABB_00009516
13	Atlantis PQ-GVA 27000 Technical Report 1440-50-HS-RP-070-0009 Rev 03 (issued for detailed engineering).pdf	BPEP_ABB_00009902	BPEP_ABB_00009942
14	Atlantis 1st oil HAZID Study Report 1440-10-HS-RP-0025 Rev A	BPEP_ABB_00011088	BPEP_ABB_00011108
15	1440-20-HS-RP-XXXX Rev A	BPEP_ABB_00011115	BPEP_ABB_00011132
16	DD2 HAZID 1440-20-HS-RP-XXXX Rev A	BPEP_ABB_00011133	BPEP_ABB_00011190
17	AtlantisFinal Geohazards Assessmnts Vol 1 & 2 DSK .pdf	BPEP_ABB_00011191	BPEP_ABB_00011446
18	Atlantis FLOTEL HAZID Report - Rev A.doc	BPEP_ABB_00011447	BPEP_ABB_00011480
19	Atlantis Pre-start PHSSER close-out session.ppt	BPEP_ABB_00011481	BPEP_ABB_00011498
20	Atlantis Pre-start PSSR Feedback.ppt	BPEP_ABB_00011499	BPEP_ABB_00011512
21	Atlantis Split-Startup HAZID Report - Rev 1.doc	BPEP_ABB_00011513	BPEP_ABB_00011534
22	Topside Commissioning HAZID 1440-20-HS-RP-XXXX Rev A	BPEP_ABB_00011535	BPEP_ABB_00011583
23	Dewatering and Flowback HAZOP Rev0.PDF	BPEP_ABB_00011584	BPEP_ABB_00011600
24	Hazard Review Table of Contents.xls	BPEP_ABB_00011601	BPEP_ABB_00011601
25	Heavy Lift HAZID 1440-25-HS-RP-00XX Rev A	BPEP_ABB_00011602	BPEP_ABB_00011610
26	1440-31-HU-MA-0006, Rev 2 (guideline added)	BPEP_ABB_00013767	BPEP_ABB_00013900

Sawyer-000055

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
27	1440-31-HU-MA-0007, Rev 1 (guideline added, statement added)	BPEP_ABB_00013901	BPEP_ABB_00014027
28	1440-31-HU-MA-0008 Rev 1 (revised drawing 1440-30-SB-LI-0471 added, statement added, revised copy added)	BPEP_ABB_00014028	BPEP_ABB_00014154
29	DC1 Well Systems Integration & Design Engineering 1440-30-HS-RP-0281 Rev 0	BPEP_ABB_00027094	BPEP_ABB_00027124
30	DC1 Well Systems Integration & Design Engineering 1440-30-HS-RP-0283 Rev 0	BPEP_ABB_00027125	BPEP_ABB_00027223
31	Atlantis DC-1 Jumper Installation HAZID 1440-39-HI-RP-0009 Rev0	BPEP_ABB_00027224	BPEP_ABB_00027289
32	DC1 BP Atlantis Manifold Flushing Test Hazard Identification (HAZID) and Hazard and Operability (HAZOP) Workshops 1440-39-HI-RP-0009 Rev 0	BPEP_ABB_00027290	BPEP_ABB_00027349
33	BP DC1 Well Systems Integration & Design Engineering Manifold Installation HAZID Analysis Report 1440-30-HS-RP-0210 Rev 0	BPEP_ABB_00027350	BPEP_ABB_00027446
34	Gulf of Mexico Deepwater Development Program PIP Flowline and Riser Load Out Hazid Report 1440-34-FL-RP-0226 Rev 0	BPEP_ABB_00027447	BPEP_ABB_00027496
35	DC1 Technip (3478-BRI-RA-0107) Well Systems Integration and Design Engineering, SCR Pull In System FMEA And Hazid May 2004 Close Out Report 1440-70-IG-RP-0056 Rev 0	BPEP_ABB_00027497	BPEP_ABB_00027511
36	Atlantis Subsea Phase 1 HAZOP- Terms of Reference 1440-33-SB-PR-0099 Rev 0	BPEP_ABB_00027556	BPEP_ABB_00027576
37	Letter: This letter serves to notify our of our intention to continue our audit of these records at asite of our choice.	BPEP_ABB_00028270	BPEP_ABB_00028271
38	1440-85-OP-PR-3017, Rev 0, Gulf of Mexico Deepwater Production, Subsea Procedures - 17.0, ESD Test	BPEP_ABB_00082514	BPEP_ABB_00082522
39	Deepwater GoM Production Document Control Procedure	AB0005838	AB0005859
40	E-Mail From Dennis Sustala (BP) To Domangue (MMS), Taylor, Todd, Gum, Lowe, Oneto, Snook, Smit, Harrison, Powell, Herrmann, Gipson, Grant, DeJohn RE Documentation of Agreements Concerning FSV's at GC787, A Platform, OCSG 23579, Atlantis Project [In PSS-30 folder dated	BPEP_ABB_00086107	BPEP_ABB_00086108
41	1440-20-HS-DG-1000; Rev. 10 (BP Final Handover); Safety Plan Index Sheet; BP, Mustang [In PSS-35 folder dated 12/8/2008]	BPEP_ABB_00086391	BPEP_ABB_00086418
42	Letter From Dennis Sustala (BP) To Ben Coco (MMS) & Arvind Shah (MMS) RE Verification of Atlantis Platform Installatio Date - Green Canyon Block 787, Platform A, Right-of-Use and Easement OCS-G 23579 Floating Production System, Semi-Submersible Production Quarters (PQ) [In PVP-24 folder dated 3/19/2007]	BPEP_ABB_00087687	BPEP_ABB_00087688
43	E-Mail Chain From David Whitehead (Technip) To Fraske (BP), Haqqani (Technip/BP), McDaniel (BP) Gutierrez (BP), Berger (Manatee/BP), Sanders (Technip) RE EFL Locations - FMC vs. Technip Dwgs	BPEP_ABB_00088942	BPEP_ABB_00088943
44	E-Mail From Ron Berger (Manatee) To Weber, Mack (Technip), Curtis, Vass (Technip), Berger (Manatee) RE Minutes From October 2, 2009 3478-BSB-DE-1008 Review	BPEP_ABB_00088954	BPEP_ABB_00088954
45	PHSSER Close-Out recommendations7_25_07.doc	BPEP_ABB_00088978	BPEP_ABB_00088979
46	ANF Define PHSSER Agenda.doc	BPEP_ABB_00088983	BPEP_ABB_00088984
47	ANF Define PHSSER ToR.doc	BPEP_ABB_00088985	BPEP_ABB_00088986
48	Atlantis Pre-start PHSSER close-out session.ppt	BPEP_ABB_00088988	BPEP_ABB_00089005
49	Atlantis Pre-startup PHSSER ToR (5).ZIP?Atlantis Pre-startup PHSSER ToR (5).doc	BPEP_ABB_00089007	BPEP_ABB_00089008
50	TERMS OF REFERENCE, Atlantis Subsea Phase 1 (SS1), Peer Review/PHSSER Close-Out, Rev 0	BPEP_ABB_00089010	BPEP_ABB_00089091

Sawyer-000056

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
51	PSSR CHECKLIST rev3.xls	BPEP_ABB_00089095	BPEP_ABB_00089095
52	Atlantis GBB PSSR ToR - 041807.doc	BPEP_ABB_00089096	BPEP_ABB_00089099
53	Handover time is nearing.mht;Sayer, Fred (Udelhoven) <Fred.Sayer@bp.com>;Jondle, John J <john.jondle@BP.com>; Ward, Charlos C <Charlos.Ward@BP.com>; Weber, Rick G <Rick.Weber@BP.com>; Watt, Andy (Technip) <Andy.Watt@BP.com>; Webb, Simon P <Simon.Webb@BP.com>; Horn, Chuck (Technip) <chorn@technip.com>; Hughes, John D <john.hughes2@BP.com>; Harjo, Anthony (Technip) <aharjo@technip.com>; Schwebel, John <John.Schwebel@BP.com>; Evans, Bob (Technip) <Bob.Evans2@BP.com>; Rosen, John P (Udelhoven) <john.rosen@BP.com>; Fuselier, Jimmy <jimmy.fuselier@BP.com>; Herrmann, Bob P <Bob.Herrmann@BP.com>; Mack, John G <John.Mack@BP.com>; Kirkham, Benny (BAMA) <Benny.Kirkham@BP.com>; Sorrel, David (Acock) <Marcial.Sorrel@BP.com>; Whitehead, David K (Technip) <David.Whitehead@BP.com>; Smit, Dirk <Dirk.Smit@BP.com>; Berger, Ron K (Manatee) <ron.berger@BP.com>; Oza, Nita <Nita.Oza@BP.com>; Malone, Ryan P <Ryan.Malone@BP.com>; Weber, Dana (R&D Technical) <Dana.Weber@BP.com>; Brooking, Royal <Royal.Brooking@BP.com>; royal@dumont-ranch.com; Huntton, George G (Clover) <George.Huntton@BP.com>	BPEP_ABB_00089100	BPEP_ABB_00089101
54	Atlantis Pre Start Up PHSSER findings(1).xls	BPEP_ABB_00089119	BPEP_ABB_00089119
55	FW: Atlantis PHSSER Action assignments.mht;Oneto, Rick <Rick.Oneto@bp.com>;Ahlf, Thomas W <Thomas.Ahlf@BP.com>; Babooram, Seepersad <Seepersad.Babooram@BP.com>; Ball, Connie <Connie.Ball@BP.com>; Berger, Ron K (Manatee) <ron.berger@BP.com>; Brown, Bill (James W) <Bill.Brown@BP.com>; DeJohn, Kenneth P <Kenneth.DeJohn@BP.com>; Gipson, Les <Les.Gipson@BP.com>; Gruver, Jim J (HOU) <Jim.Gruver@BP.com>; Guillory, James R <James.Guillory@BP.com>; Herrmann, Douglas T <Douglas.Herrmann@BP.com>; LaRue, Kelley A <Kelley.LaRue@BP.com>; Orr, Scotty <Scotty.Orr@BP.com>; Perkins, G. Shelton <G.Perkins@BP.com>; Powell, Kevin J <Kevin.Powell@BP.com>; Roades, Barth L <Barth.Roades@BP.com>; Snyder, David D <David.Snyder@BP.com>;	BPEP_ABB_00089120	BPEP_ABB_00089121
56	2007 PHSSER Closeout List	BPEP_ABB_00089122	BPEP_ABB_00089145
57	(DRAFT) Pre-Startup Project HSSE Review, Atlantis Development Project, Rev 1	BPEP_ABB_00089146	BPEP_ABB_00089203
58	Construdction PHSSER 2003.doc	BPEP_ABB_00089290	BPEP_ABB_00089305
59	Guidance on Practice for HSSE Review of Projects	BPEP_ABB_00089308	BPEP_ABB_00089363
60	12-12-06 PHSSER Kick-Off Meeting.ppt	BPEP_ABB_00089366	BPEP_ABB_00089367
61	Atlantis Pre-startup PHSSER To Rev10.doc	BPEP_ABB_00089368	BPEP_ABB_00089370
62	Atlantis PHSSER check list1.ZIP?Atlantis PHSSER check list1.xls	BPEP_ABB_00089377	BPEP_ABB_00089377
63	E-Mail From Ron Berger To Greg Sills, Gary Imm, Steve Fortune, Rick Oneto, Andrew Gregg, Ron Berger RE Atlantis Documentation Project Emergency	BPEP_ABB_00089381	BPEP_ABB_00089381
64	Atlantis September Monthly Progress Report	BPEP_ABB_00089605	BPEP_ABB_00089638
65	Project Close out for Subsea.mht;Naseman, Bill E <Bill.Naseman@bp.com>;Broman, William H(HOU) <william.broman@bp.com>;Duff, Barry C <Barry.Duff@bp.com>	BPEP_ABB_00091459	BPEP_ABB_00091459
66	Protocol to Closeout PHSSER Findings.doc	BPEP_ABB_00092756	BPEP_ABB_00092756
67	MOC OP 0235 Temp MOC to allow well start-up without operational FAM.pdf	BPEP_ABB_00092830	BPEP_ABB_00092838
68	OPERATIONS / HUC MOC's (Subject: MOC Meeting Minutes)	BPEP_ABB_00092929	BPEP_ABB_00092932
69	HSSE Checklist.doc	BPEP_ABB_00093005	BPEP_ABB_00093005

Sawyer-000057

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
70	Email Chain: McVass to Abbott FW: Test Records in Documentum [BP original letter to vendor for turnover.PDF; Letter to Vendors for Turnover Rev 1.doc; Letter to Vendors for Turnover - Rev2.pdf; pic22570.gif]	BPEP_ABB_00095567	BPEP_ABB_00095569
71	Document Review & Approval Requirements - 1410-30-QA-SP-1503.htm;McDougall, John (Orion Engineering) <John.McDougall@bp.com>;Gookin, Lanny (UNKNOWN BUSINESS PARTNER) <Lanny.Gookin@bp.com>; Thomas, Teruko T <Teruko.Thomas@bp.com>; Webber, Michael W <Michael.Webber@bp.com>; Hughes, John D <john.hughes2@bp.com>; Broman, William H(HOU) <william.broman@bp.com>; Bednar, John M <John.Bednar@bp.com>; Ferley, Craig F <Craig.Ferley@bp.com>; Peloubet, Robert R <Robert.Peloubet@bp.com>; Kennelley, Kevin J <kennelkj@bp.com>; Steel, William JM. <William.Steel@bp.com>; Saha, Lynn E <Lynn.Saha@bp.com>; Sinnett, Nicholas J. <Nicholas.Sinnett@bp.com>; McDaniel, Colby (JJC) <Colby.McDaniel@bp.com>; Mack, John G <John.Mack@bp.com>; Peurifoy, Charles K (ORION ENGINEERING) <Charles.Peurifoy@bp.com>; Huntoon, George G (Clover) <George.Huntoon@bp.com>; Vass, Malcolm (Technip) <mcvass@technip.com>; Hudson, Mark G <mark.hudson@bp.com>; Beckmann, Marvin (MANATEE INC) <Marvin.Beckmann@bp.com>; Garza-Salazar, Rocio (Orion) <Rocio.Garza-Salazar@bp.com>; Hernandez, Christina (Loes & Assoc.) <Christina.Hernandez@bp.com>; Blackmon, Jennifer (SWIFT TECHNICAL SERVICES) <Jennifer.Blackmon@bp.com>; Fuess, Lawrence J. (Orion) <Lawrence.Fuess@bp.com>; Burns, Johanne (ORION ENGINEERING) <Johanne.Burns@bp.com>; Mitchell, Greta M (Orion) <Greta.Mitchell@bp.com>; Curtis, Tinikka (NES) <Tinikka.Curtis@bp.com>	BPEP_ABB_00095783	BPEP_ABB_00095783
72	Email Chain: Abbott to Broman FW: Atlantis Document Control - Path Forward-PROGRESS UPDATE on 1/13/09	BPEP_ABB_00095905	BPEP_ABB_00095908
73	Email: Broman to Hughes, Schwebel, Malone R, Jondie, Mack, Kirkham, Whitehead (Technip), Vass (Technip), Weber; Re: Atlantis Document Control - Path Forward [Sector 31 -Wellheads -J. Hughes.xls; Sector 32 - Trees - R. Weber.ZIP; Sector 33 - Manifolds - J. Schwebel. ZIP; Sector 34 - Pipelines - J.Mack.ZIP; Sector 35 - Controls - D.Whitehead.ZIP; Sector 36 - Umbilical - B. Kirkham.ZIP; Sector 37 - Risers - J. Mack.ZIP; Sector 70 - Installation - J. Hughes.ZIP]	BPEP_ABB_00096044	BPEP_ABB_00096046
74	Stamped Technip PLET Drawings (after Pipe Mods)..htm;Evans, Bob (Delta Marine Tech) <Bob.Evans2@bp.com>;Peloubet, Robert R <Robert.Peloubet@bp.com>; McDougall, John (Orion Engineering) <John.McDougall@bp.com>;	BPEP_ABB_00099336	BPEP_ABB_00099336
75	FMC Technologies SSV/USV Functional Test Dat Sheet 6A/17D	BPEP_ABB_00099384	BPEP_ABB_00099443
76	1440-34-FL-DC-0001; Rev. 1 (Revised as Noted)flowline Design Basis Document Execute Phase	BPEP_ABB_00101079	BPEP_ABB_00101109
77	Email- Re: Engineering Execution Process Letter; From Kevin Hannigan to Robert Peloubet, Nicholas Sinnett. CC: George Bradley	BPEP_ABB_00101555	BPEP_ABB_00101555
78	Letter Kevin Hannigan to Robert Peloubet, 8-16-10	BPEP_ABB_00101556	BPEP_ABB_00101556
79	1440-10-PM-RP-1000; Rev. 1; Final Report: Pre-Startup Project HSSE Review	BPEP_ABB_00101853	BPEP_ABB_00101944
80	Supplemental Deepwater Operations Plan (DC3) 2010 02 10 DWOP Revision DC3 Expansion Letter.pdf	BPEP_ABB_00102288	BPEP_ABB_00102292
81	RE: Well valve timing.mht;Ragan, Frank <Frank.Ragan@bp.com>;Oza, Nita <Nita.Oza@bp.com>;Young, Brian J <Brian.J.Young@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>; Sustala, Dennis R <Dennis.Sustala@bp.com>	BPEP_ABB_00103866	BPEP_ABB_00103866
82	Atlantis PDWOP - Reformatted- Final Version.ZIP?PDWOP Sec 16.0 HSE Risk Management - SWS.doc	BPEP_ABB_00104878	BPEP_ABB_00104884
83	PDWOP Section 16.0 HSE Risk Management.doc	BPEP_ABB_00105500	BPEP_ABB_00105507
84	TH HSE Risk Managment.ZIP?TH HSE Risk Managment.doc	BPEP_ABB_00106084	BPEP_ABB_00106089
85	Atlantis Topsides Design Criteria.doc	BPEP_ABB_00106136	BPEP_ABB_00106205
86	RE: CETCO modifications - PSS.htm;DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>;Roades, Barth L <Barth.Roades@bp.com>; Sustala, Dennis R <Dennis.Sustala@bp.com>; Herrmann, Douglas T <Douglas.Herrmann@bp.com>;Bish, Steven S <Steven.Bish@bp.com>; Saadatmand, Nassrine	BPEP_ABB_00107012	BPEP_ABB_00107014
87	E-Mail Chain From Phillips (MEI) to Sustala, Osborn (MEI) RE Production System Package Deliverables	BPEP_ABB_00110518	BPEP_ABB_00110520
88	RE: MMS submittals for a floater - Please advise.htm;Phillips, Ralph <philrmus@bp.com> - on behalf of - Phillips, Ralph (Mustang Engineering) <philrmus@bp.com>;Sustala, Dennis R <sustaldr@bp.com>;	BPEP_ABB_00110972	BPEP_ABB_00110978

Sawyer-000058

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
89	FW: MMS submittals for a floater - Please advise.htm;Phillips, Ralph <philrmus@bp.com> - on behalf of - Phillips, Ralph (Mustang Engineering) <philrmus@bp.com>;Sustala, Dennis R <sustaldr@bp.com>;	BPEP_ABB_00110984	BPEP_ABB_00110986
90	Attachment - HAZID Worksheets.pdf	BPEP_ABB_00111226	BPEP_ABB_00111251
91	1440-50-PM-PR-0100 FST PEP.zip?1440-50-PM-PR-0100 FST PEP.doc	BPEP_ABB_00111486	BPEP_ABB_00111604
92	ATTA.doc	BPEP_ABB_00111649	BPEP_ABB_00111649
93	ATTB.doc	BPEP_ABB_00111650	BPEP_ABB_00111650
94	Procedure MEI.doc	BPEP_ABB_00112245	BPEP_ABB_00112246
95	GVAC report.htm;LPekel@eagle.org;jansson, Karl-Gustav (GVA Consultants) <karl.jansson@mustangeng.com>; Dave Barton <Dave.Barton@Halliburton.com>;Homer, Steve T (BHP) <steven.t.homer@bhpbilliton.com>; Sustala, Dennis R <sustaldr@bp.com>; Unger,	BPEP_ABB_00112345	BPEP_ABB_00112345
96	Resolution of MMS PE Stamp Issue.htm;Stephen Kinnaman - BP <Stephen.Kinnaman@Halliburton.com>;Sustala, Dennis R <sustaldr@bp.com>;Homer, Steve T (BHP) <steven.t.homer@bhpbilliton.com>; Faulkner, James (BP) <james.faulkner@mustangeng.com>;	BPEP_ABB_00112348	BPEP_ABB_00112348
97	PE/CVA.htm;LPekel@eagle.org;Stephen Kinnaman - BP <Stephen.Kinnaman@Halliburton.com>; Sustala, Dennis R <sustaldr@bp.com>;Homer, Steve T (BHP) <steven.t.homer@bhpbilliton.com>	BPEP_ABB_00112350	BPEP_ABB_00112351
98	Re: .htm;LPekel@eagle.org;Sustala, Dennis R <sustaldr@bp.com>;RMajor@eagle.org	BPEP_ABB_00112396	BPEP_ABB_00112396
99	Minutes of Meeting 12-05-02.doc	BPEP_ABB_00112398	BPEP_ABB_00112400
100	Re: GVA Certification.htm;LPekel@eagle.org;Sustala, Dennis R <sustaldr@bp.com>;	BPEP_ABB_00112401	BPEP_ABB_00112402
101	E-Mail Chain From MTC, Inc. to Kinnama (BP/Halliburton), Sustala (MEI/BP) RE Certification Requirements For Platforms an Production Systems	BPEP_ABB_00112423	BPEP_ABB_00112425
102	E-Mail Chain From Dennis Sustala To LPekel@eagle.org' RE Verification vs. Certification	BPEP_ABB_00112441	BPEP_ABB_00112442
103	Re: Verification vs. Certification.htm;LPekel@eagle.org;Sustala, Dennis R <sustaldr@bp.com>;	BPEP_ABB_00112443	BPEP_ABB_00112443
104	PE qualification of ABS.htm	BPEP_ABB_00112449	BPEP_ABB_00112449
105	FW: Certification Requirements for Platforms and Production Systems.htm;Sustala, Dennis R;mtc@houston.rr.com;	BPEP_ABB_00112450	BPEP_ABB_00112452
106	FW: Professional Engineering Stamps.htm;jansson, Karl <karl.jansson@mustangeng.com>;Sustala, Dennis R <sustaldr@bp.com>;	BPEP_ABB_00112524	BPEP_ABB_00112526
107	E-Mail Chain From Jansson (MEI) To Pekel, Barton (Halliburton), Homer (BHP), Sustala (BP), Eriksson (GVA Consultants), Faulkner (BP/Halliburton) RE Submittal Report 11/11/2002 - GVAC Respond	BPEP_ABB_00112534	BPEP_ABB_00112535
108	E-Mail Chain From Sustala To MTC, Inc. RE Register PE Stamp for the CVA Processes	BPEP_ABB_00112612	BPEP_ABB_00112613
109	FW: Topsides Module Drawings.htm;DeJohn, Ken <ken.dejohn@mustangeng.com>;Chumchal, William (Mustang Engineering) <william.chumchal@mustangeng.com>;Sustala, Dennis R <sustaldr@bp.com>; Johnson, Charles (Mustang Engineering)	BPEP_ABB_00113925	BPEP_ABB_00113925
110	RE: INFO: Atlantis.htm;Domangue, Bryan <Bryan.Domangue@boemre.gov>;Todd, Simon P <Simon.Todd@bp.com>;	BPEP_ABB_00115545	BPEP_ABB_00115546
111	Letter From Simon Todd (BP) To Bureau of Ocean Energy Management, Regulation & Enforcement, Attention: Michael J. Saucier (MS 5200) RE Engineer Drawings Pertaining To The Atlantis Platform	BPEP_ABB_00115564	BPEP_ABB_00115566
112	Slide pack from April 6th 2010 New Orleans Meeting.mht;Todd, Simon P;Domangue, Bryan <Bryan.Domangue@mms.gov>;Todd, Simon P <Simon.Todd@bp.com>; MC252_Email_Retention <MC252_Email_Retention@bp.com>	BPEP_ABB_00115609	BPEP_ABB_00115609
113	Atlantis Response.pdf	BPEP_ABB_00115610	BPEP_ABB_00115657
114	Email chain: Peloubet to Todd, Broman, Benson, McDougall (Orion Engineering) RE Subsea As-Built	BPEP_ABB_00115759	BPEP_ABB_00115760

Sawyer-000059

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
115	Email chain: Broman to Todd, Peloubet SUBSEA AS-BUILTS	BPEP_ABB_00115761	BPEP_ABB_00115762
116	ERP_1440-85-OP-PR-0005rev 1 (2).doc	BPEP_ABB_00115829	BPEP_ABB_00115907
117	Revised ppt.mht;Smit, Dirk <Dirk.Smit@bp.com>;Todd, Simon P <Simon.Todd@bp.com>; Yeley, Ryan <ryan.yeley@uk.bp.com>;	BPEP_ABB_00115994	BPEP_ABB_00115994
118	Drawing Nomenclature.ppt	BPEP_ABB_00115995	BPEP_ABB_00115995
119	DC-111 Handover Package Rev. 0; 1440-31-HU-MA-0005.ZIP?1440-31-HU-MA-0005.pdf	BPEP_ABB_00115997	BPEP_ABB_00116109
120	FW: Subsea SH1's prior to FO.mht;Babooram, Seepersad <Seepersad.Babooram@bp.com>;Todd, Simon P <Simon.Todd@bp.com>;	BPEP_ABB_00116323	BPEP_ABB_00116323
121	1440-35-SB-DG-0109.ZIP?1440-35-SB-DG-0109 (2).pdf	BPEP_ABB_00116324	BPEP_ABB_00116324
122	1440-35-SB-DG-0167-001.ZIP?1440-35-SB-DG-0167-001 (2).pdf	BPEP_ABB_00116325	BPEP_ABB_00116325
123	Subsea SH1 Atlantis First Oil056.tif	BPEP_ABB_00116327	BPEP_ABB_00116327
124	"Atlantis Project - Gulf of Mexico - Deepwater Development Program - SUBSEA SYSTEM HANDOVER PACKAGE - DC1 - Flowlines P&T - System No. AT1-003 - Volume 1 of 2"	BPEP_ABB_00116367	BPEP_ABB_00116998
125	"Atlantis Project - Gulf of Mexico - Deepwater Development Program - SUBSEA SYSTEM HANDOVER PACKAGE - DC1 - Flowlines P&T - System No. AT1-003 - Volume 2 of 2"	BPEP_ABB_00116999	BPEP_ABB_00117155
126	1440-31-HU-MA-0005 Rev 1; "Atlantis Project - Gulf of Mexico - Deepwater Development Program - SUBSEA SYSTEM HANDOVER PACKAGE - DC111 - DC-111-F4 - System No. AT1-01-111"	BPEP_ABB_00117156	BPEP_ABB_00117269
127	1440-34-HU-MA-0346 Rev 3 "Atlantis Project - Gulf of Mexico - Deepwater Development Program - SUBSEA SYSTEM HANDOVER PACKAGE - MANIFOLDS SOUTH 2A & 4A TEST HEADER TO PLEM PT - System No. AT1-007-01"	BPEP_ABB_00117270	BPEP_ABB_00117622
128	"Atlantis Project - Gulf of Mexico - Deepwater Development Program - SUBSEA SYSTEM HANDOVER PACKAGE - DC1 - H2 Hydraulic Umbilical System No. AT1-107-02"	BPEP_ABB_00117623	BPEP_ABB_00117791
129	"Atlantis Project - Gulf of Mexico - Deepwater Development Program - SUBSEA SYSTEM HANDOVER PACKAGE - DC1 - H6 Hydraulic Umbilical System No. AT1-107-06"	BPEP_ABB_00117792	BPEP_ABB_00118058
130	"Atlantis Project - Gulf of Mexico - Deepwater Development Program - SUBSEA SYSTEM HANDOVER PACKAGE - E4 ELECTRICAL UMBILICAL - System No. AT1-108-04"	BPEP_ABB_00118059	BPEP_ABB_00118372
131	API Recommended Practice 14C, Seventh Edition, March 2001 - Recommended Practice for Analysis, Design, Installation, and Testing of Basic Surface Safety Systems for Offshore Production Platforms		
132	VDB - AT-CAB-J312 - 100034273-001 - SPCU System - FMC.pdf	BPEP_ABB_01178174	BPEP_ABB_01179662
133	SPC-0000022994	BPEP_ABB_01397799	BPEP_ABB_01397839
134	Document Control Procedure;McVass@technip.com;Belanger, Deanna <belangdk@bp.com>;	BPEP_ABB_01453322	BPEP_ABB_01453322
135	3478-PR-PC-0012-Rev 0 ; TECHNIP OFFSHORE, INC. Document Control Procedure bp Deepwater Development Projects Document Control Procedure; Technip	BPEP_ABB_01453323	BPEP_ABB_01453333
136	Process Hazards Analysis Revalidation and Layer Protection Analysis marine systems	BPEP_ABB_01453571	BPEP_ABB_01453571
137	TH Infill EDR PHSSER READINESS ASSESSRevC.ZIP?TH Infill EDR PHSSER READINESS ASSESSRevC.xls	BPEP_ABB_01454089	BPEP_ABB_01454089
138	1440-33-QA-CR-3055 1.pdf DC1- DC3 FMC/Duron Systems Quality Notification, ROV Panel- Drawing Mis-Interpreted	BPEP_ABB_01454882	BPEP_ABB_01454889
139	1440-31-HU-MA-0007; Rev. 0 Handover Package for Well DC-113.	BPEP_ABB_01455760	BPEP_ABB_01455884
140	3478-BQA-RA-0001 Rev NA.pdf	BPEP_ABB_01460799	BPEP_ABB_01460811
141	1440-33-PI-PR-3398 Rev C.pdf Report, Verification, Valves-Gate	BPEP_ABB_01463415	BPEP_ABB_01463478

Sawyer-000060

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
142	1440-38-QA-CR-3000 .pdf DC3 FMC/Protec Quality Notification	BPEP_ABB_01464418	BPEP_ABB_01464432
143	1440-35-SB-SP-0030.pdf; Functional Design Specification for the Master Control Station/Subsea Control Unit	BPEP_ABB_01465756	BPEP_ABB_01465840
144	HAZID-HAZOP-PHSSERS (2).xls	BPEP_ABB_01466590	BPEP_ABB_01466590
145	1440-035-SB-PR-3285 Rev A Cd 1.pdf; Test Procedure, Software Test, Subsea-Controls, BP Atlantis CWTU, MCS HDS	BPEP_ABB_01473571	BPEP_ABB_01473598
146	1440-35-SB-MA-3024 Rev A.pdf Rev. A Volume 5B Production Controls - SPCU - Procedures - DBIs and Drawings	BPEP_ABB_01476907	BPEP_ABB_01477376
147	1440-32-HU-MA-0022.pdf	BPEP_ABB_01484800	BPEP_ABB_01485010
148	1440-32-HU-MA-0023.pdf; Rev 1; DC-143 Handover Package	BPEP_ABB_01485011	BPEP_ABB_01485194
149	1440-32-HU-MA-0021.pdf; Rev. 1; DC-123 Handover Package	BPEP_ABB_01485249	BPEP_ABB_01485420
150	1440-31-HU-MA-0006 Rev. 0; DC-112 Handover Package	BPEP_ABB_01485421	BPEP_ABB_01485552
151	DC-112 Handover Package Earlier Revision Dc748.pdf	BPEP_ABB_01486321	BPEP_ABB_01486455
152	1410-30-QA-SP-1503; Rev. 4 (Updated, issued for Approval and Use) INTEGRATED ATLANTIS/THUNDER HORSE PROJECTS TEAM Document Review & Approval Requirements Dc1431.pdf	BPEP_ABB_01491145	BPEP_ABB_01491159
153	Atlantis Subsea HSSE Plan - 2008.docm	BPEP_ABB_01495233	BPEP_ABB_01495263
154	Atlantis Single Barrier Jumper Installation HAZID Report Rev A (2).doc	BPEP_ABB_01495266	BPEP_ABB_01495297
155	Process Hazards Analysis and Layer of Protection Analysis	BPEP_ABB_01496511	BPEP_ABB_01496594
156	3009243-000 BP Atlantis Phase 2a Topsides (H8 and H10) HAZID Rev. 0 1440-50-HS-RP-6001.pdf	BPEP_ABB_01496691	BPEP_ABB_01496732
157	3009243-000 BP Atlantis Phase 2a Topsides (H8 and H10) PHA Rev. 0 1440-50-HS-RP-6000.pdf	BPEP_ABB_01496733	BPEP_ABB_01496805
158	1-25 Request list.ZIP?1-25 Request list.xls[attached to 1496966]	BPEP_ABB_01496967	BPEP_ABB_01496967

Sawyer-000061

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
159	New Document Control Set-Up; McDougall, John (Orion Engineering) <John.McDougall@bp.com>; Karim, Al-Kamal (Technip) <al-kamalkarim@bp.com>; Swan, Antwon <antwonswan@bp.com>; Breaux, Beau <breaub0@bp.com>; Kirkham, Benny (BAMA) <kirkhab@bp.com>; bforeman@technip.com; Evans, Bob (Delta Marine Tech) <evanb2@bp.com>; Young, Brian J <younbx@bp.com>; Marsden, Brent I (Contractor) <marsb6@bp.com>; bmoreno@technip.com; Weber, Dana (R&D Technical) <webed2@bp.com>; Gutierrez, Daniel <gutierd@bp.com>; dcolet@rtintl.com; Byrne, Derek (Swift Oil & Gas) <byrnd3@bp.com>; McNaught, David <mcnad1@bp.com>; Whitehead, David K (Technip) <whitdz@bp.com>; dsanders@technip.com; Munstereifel, Eric J (Delta Marine Tec) <munsej@bp.com>; Smith, Fred (Trendsetter) <smitt8@bp.com>; Malone, Garrick <malog1@bp.com>; Sittig, Gene <sittg0@bp.com>; Huntoon, George G (Clover) <huntgg@bp.com>; Betancourt, Gerald (Rider Hunt International) <betag0@bp.com>; Hahn, Guillermo (Technip) <hahnguillermo@bp.com>; Haqqani, Hakeem (Technip) <hakeemhaqqani@bp.com>; Jackson, Johnny (Obsidian) <jack64@bp.com>; Walsh, Jay (NES OVERSEAS USA LLC) <walsj9@bp.com>; Ray, Jim L (Manatee) <rayjl1@bp.com>; Hughes, John D <hughesjd_new@bp.com>; Jondle, John J <jondjj@bp.com>; Mack, John G <mackjg1@bp.com>; Schwebel, John <schwj6@bp.com>; Mishner, Jeff (Technip) <jeffmishner@bp.com>; Williams, J.R. (Technip) <j.r.williams@bp.com>; Saenz, Joe (Technip) <saenjl@bp.com>; Finkelstein, Judy <judyfinkelstein@bp.com>; Lan, Jundong (Technip) <jundonglan@bp.com>; jwhitworth@technip.com; Kahlden, Ken M (Clover) <kahldek@bp.com>; Cantrell, Kirk (Delta Marine Tec) <cantk2@bp.com>; Kinley, Kae (Technip) <kaekinley@bp.com>; Harper, Mario A <harpma@bp.com>; Marciniak, Matt <marc13@bp.com>; Price, Mike (Clover) <pricm1@bp.com>; Vass, Malcolm (Technip) <malcolmvass@bp.com>; Cyvas, Matt (Technip) <mattecyvas@bp.com>; nkelley@technip.com; psubramanian@technip.com; Egner, Paul (EPCglobal) <egnep0@bp.com>; Cavalier, Rebecca (Turner & Townsend) <cavara@bp.com>; Weber, Rick G <weberrg@bp.com>; nnaik@technip.com; rphillips@technip.com; Tellez, Robert (Technip) <roberttellez@bp.com>; Velasquez, Roy (Technip) <velarcae@bp.com>; smaderia@technip.com; Powell, Simm A <powes5@bp.com>; Silva, Stanley S <silvs2@bp.com>; Rivera, Shalimar M (TECHNIP) <rivesm@bp.com>; Berg, Shawn V (Technip) <bergsvcae@bp.com>; Curtis, Tinikka (NES) <curtt0@bp.com>; Shea, Twyla (Technip) <twylashea@bp.com>; Broman, William H (HOU) <bromanwh@bp.com>; Dean, Wayne (TECHNIP) <deanw2@bp.com>; Greenleaf, Bill (Technip) <billgreenleaf@bp.com>; Bowers, Willie Mae (Technip) <bowewm@bp.com>; Saw, Yen T (Technip) <sawytcae@bp.com>; Breaux, Beau <breaub0@bp.com>; Erwin, Laurie <erwinla@bp.com>; Gebhart, Lucy A <gebharla@bp.com>; Huth, Pete <huthp0@bp.com>; Tait, Xiaodan (TURNER & TOWNSEND ENERGY) <taitx0@bp.com>; Shi, Hua <shih01@bp.com>; Roberts, Charlie A (Technor Intl) <robec7@bp.com>; Pabon, Martin <pabonm2@bp.com>; lee.norris@sptgroup.com; Marsden, Brent I (Contractor) <marsb6@bp.com>; Gutierrez, Luis (Manatee) <gutierl@bp.com>; Blackmon, Jennifer (SWIFT TECHNICAL SERVICES) <blacjo@bp.com>; Fuess, Lawrence J. (Orion) <fuesl0@bp.com>; Peloubet, Robert R <peloubrr@bp.com>; Thomas, Teruko T <tillta@bp.com>; Steel, William J.M.	BPEP_ABB_01497697	BPEP_ABB_01497698
160	Atlantis Pre-Startup PHSSER Final Report 18 Mar 09.doc	BPEP_ABB_01498649	BPEP_ABB_01498671
161	Process Hazards Analysis 3009218-000 BP Atlantis North Flank Dual Flowline HAZOP Rev A .pdf	BPEP_ABB_01499070	BPEP_ABB_01499148
162	RE: Atlantis Document Control - Path Forward; Hughes, John D <john.hughes2@bp.com>; Blackmon, Jennifer (SWIFT TECHNICAL SERVICES) <blacjo@bp.com>; Atlantis Document Control <atlantisdocumentco@bp.com>; Curtis, Tinikka (NES) <curtt0@bp.com>	BPEP_ABB_01499198	BPEP_ABB_01499202
163	DDIII Methanol Skid Fire_Blast HAZID HAZOP Report - Rev 0 Garrick Edit 1440-35-HS-RP-0300.pdf	BPEP_ABB_01499842	BPEP_ABB_01499877
164	2010-T2-EA-LI-000001 HAZID HAZOP Facilitators Rev 1.ZIP?2010-T2-EA-LI-000001 HAZID HAZOP Facilitators Rev 1 (2).doc	BPEP_ABB_01500038	BPEP_ABB_01500044
165	Hazid-Hazop-Lopa facilitators 11_07_08 (3) (3).doc	BPEP_ABB_01500046	BPEP_ABB_01500050
166	Hazard and Operability Study.ZIP?Hazard and Operability Study.pdf	BPEP_ABB_01500051	BPEP_ABB_01500107
167	RE: FW: Test Records in Documentum; Weber, Dana (R&D Technical) <Dana.Weber@bp.com>; Vass, Malcolm (Technip) <malcolmvass@bp.com>; Abbott, Ken (SWIFT TECHNICAL SERVICES) <ab3ok0@bp.com>; Huntoon, George G (Clover) <huntgg@bp.com>; Hughes, John D <hughesjd_new@bp.com>; Jondle, John J <jondjj@bp.com>; Schwebel, John <schwj6@bp.com>; Malone, Ryan P <malorp@bp.com>; Curtis, Tinikka (NES) <curtt0@bp.com>; Broman, William H (HOU) <bromanwh@bp.com>	BPEP_ABB_01500366	BPEP_ABB_01500369
168	FW: Test Records in Documentum; Abbott, Ken (SWIFT TECHNICAL SERVICES) <Ken.Abbott@bp.com>; Vass, Malcolm (Technip) <malcolmvass@bp.com>; Curtis, Tinikka (NES) <curtt0@bp.com>; Broman, William H (HOU) <bromanwh@bp.com>; Hughes, John D <hughesjd_new@bp.com>; Malone, Ryan P <malorp@bp.com>; Jondle, John J <jondjj@bp.com>; Schwebel, John <schwj6@bp.com>; Huntoon, George G (Clover) <huntgg@bp.com>; Weber, Dana (R&D Technical) <webed2@bp.com>	BPEP_ABB_01500370	BPEP_ABB_01500371
169	RE: Atlantis Document Control - Path Forward; Curtis, Tinikka (NES); Broman, William H (HOU) <bromanwh@bp.com>; Hughes, John D <hughesjd_new@bp.com>; Schwebel, John <schwj6@bp.com>; Jondle, John J <jondjj@bp.com>; Mack, John G <mackjg1@bp.com>; Kirkham, Benny (BAMA) <kirkhab@bp.com>; Whitehead, David K (Technip) <whitdz@bp.com>; Vass, Malcolm (Technip) <v7ssm0@bp.com>; Weber, Rick G <weberrg@bp.com>; McDougall, John (Orion Engineering) <mcd019@bp.com>; Blackmon, Jennifer (SWIFT TECHNICAL SERVICES) <blacjo@bp.com>; Fuess, Lawrence J. (Orion) <fuesl0@bp.com>; WBowers@technip.com; JFinkelstein@Technip.com	BPEP_ABB_01500680	BPEP_ABB_01500682

Sawyer-000062

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
170	RE: Rough Draft -Document Control Proposal;Abbott, Ken (SWIFT TECHNICAL SERVICES) <Ken.Abbott@bp.com>;Garland, Mike L <garlml@bp.com>;Curtis, Tinikka (NES) <curtt0@bp.com>	BPEP_ABB_01500780	BPEP_ABB_01500783
171	FW: Rough Draft -Document Control Proposal;Abbott, Ken (SWIFT TECHNICAL SERVICES) <Ken.Abbott@bp.com>;Broman, William H(HOU) <bromanwh@bp.com>;Curtis, Tinikka (NES) <curtt0@bp.com>; Garland, Mike L <garlml@bp.com>	BPEP_ABB_01500784	BPEP_ABB_01500787
172	Process Hazards Analysis and Layer of Protection Analysis	BPEP_ABB_01505183	BPEP_ABB_01505266
173	1440-30-PM-RP-5000.ZIP?1440-30-PM-RP-5000.pdf	BPEP_ABB_01505370	BPEP_ABB_01505406
174	Process Hazards Analysis 3009243-000 BP Atlantis Phase 2a Topsides (H8 and H10) PHA Rev. 0 1440-50-HS-RP-6000.pdf	BPEP_ABB_01505477	BPEP_ABB_01505549
175	HAZID Report Atlantis Subsea. North Flank Build Out, Rev A.doc	BPEP_ABB_01506733	BPEP_ABB_01506740
176	Specifications Application to Subsea Control	BPEP_ABB_01509097	BPEP_ABB_01509111
177	3478-ETT-2759- signed.ZIP?3478-ETT-2759- signed.doc; Transmittal for handover packages for DC-123, DC-124, DC-143	BPEP_ABB_01509734	BPEP_ABB_01509735
178	1400-30-QA-PR-0001.ZIP?1400-30-QA-PR-0001.pdf PROJECT QUALITY PLAN (Technip)	BPEP_ABB_01510461	BPEP_ABB_01510488
179	Atlantis.Single Barrier Jumper Installation HAZID Report Rev A.doc	BPEP_ABB_01510674	BPEP_ABB_01510705
180	Atlantis Subsea HSSE Plan - 2008.docm	BPEP_ABB_01511009	BPEP_ABB_01511039
181	3478-ETT-2686- signed .ZIP?3478-ETT-2686- signed .doc; Transmittal of Several FO Equipment Documents incl Well DC-113 and Manifold 1A, Umb H6	BPEP_ABB_01511819	BPEP_ABB_01511820
182	HSE Audit Report Theodore Spool Base.ZIP?HSE Audit Report Theodore Spool Base (5).doc	BPEP_ABB_01513424	BPEP_ABB_01513455
183	HSE Corrective Action Request OriginalCAR1-8.ZIP?OriginalCAR1-8 (3).pdf	BPEP_ABB_01513456	BPEP_ABB_01513463
184	HSE Corrective Action Request OriginalCAR9.ZIP?OriginalCAR9 (3).pdf	BPEP_ABB_01513464	BPEP_ABB_01513464
185	HSE Audit Report Theodore Spool Base.ZIP?HSE Audit Report Theodore Spool Base (4).doc	BPEP_ABB_01513476	BPEP_ABB_01513507
186	CS- 1440-30-HS-RP-0612 - HSE Audit Theodore Base Report .ZIP?CS- 1440-30-HS-RP-0612 - HSE Audit Theodore Base Report .doc	BPEP_ABB_01513526	BPEP_ABB_01513526
187	Master Document Register List;DHill@technip.com;Curtis, Tinikka (NES) <tinikka.curtis@bp.com>;	BPEP_ABB_01513538	BPEP_ABB_01513538
188	Master Document Register - 1-10-08.xls	BPEP_ABB_01513539	BPEP_ABB_01513539
189	ANFHSSEMGtPlanPhase2A.doc	BPEP_ABB_01517641	BPEP_ABB_01517673
190	Is This Document In documentum?;McVass@technip.com;Lewis, Michael <Michael.Lewis@bp.com>; Curtis, Tinikka (NES) <tinikka.curtis@bp.com>;	BPEP_ABB_01518090	BPEP_ABB_01518093
191	Phase 2A Documents.zip?Phase 2A Documents \Atlantis Phase 2 Design Hazard Management Plan - Execute Stage 1440-10-HS-RP-6034.doc	BPEP_ABB_01518637	BPEP_ABB_01518661
192	Staff Meeting Notes;Duff, Barry C <Barry.Duff@bp.com>;Cavalier, Rebecca (Turner & Townsend) <cavara@bp.com>; Clark, Alan (Clover) <clarka7@bp.com>; Curry, James (T&T) <currj2@bp.com>; Curtis, Tinikka (NES) <curtt0@bp.com>; Kahlden, Ken M (Clover)	BPEP_ABB_01518867	BPEP_ABB_01518869
193	Atlantis Subsea Documents into Documentum ;Garland, Mike L <Mike.Garland@bp.com>;Bowens, Willie Mae (Technip) <wbowens@technip.com>; Hill, Donna (Technip) <dhill@technip.com>;Curtis, Tinikka (NES) <Tinikka.Curtis@bp.com>	BPEP_ABB_01519231	BPEP_ABB_01519231
194	Atlantis Subsea HSSE Plan - 2008.docm	BPEP_ABB_01519574	BPEP_ABB_01519604
195	ANFHSSEMGmtPlan.doc	BPEP_ABB_01520023	BPEP_ABB_01520055
196	BP Atlantis DC1 and DC3 H8 Umbilical Installation HAZID TOR.pdf	BPEP_ABB_01520783	BPEP_ABB_01520788

Sawyer-000063

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
197	Asbuilt-chronology.zip?Tie-in Index.doc	BPEP_ABB_01520805	BPEP_ABB_01520805
198	Asbuilt-chronology.zip?3478-BSB-DC-1000-02_REV12 - CANCELLED.pdf	BPEP_ABB_01520806	BPEP_ABB_01520806
199	Asbuilt-chronology.zip?3478-BSB-DC-1000-02_REV-4.pdf	BPEP_ABB_01520807	BPEP_ABB_01520807
200	Asbuilt-chronology.zip?3478-BSB-DC-1000-02_REV-5.pdf	BPEP_ABB_01520808	BPEP_ABB_01520808
201	Asbuilt-chronology.zip?3478-BSB-DC-1000-02_REV-6.pdf	BPEP_ABB_01520809	BPEP_ABB_01520809
202	Asbuilt-chronology.zip?3478-BSB-DC-1000-02_REV-7.pdf	BPEP_ABB_01520810	BPEP_ABB_01520810
203	Asbuilt-chronology.zip?3478-BSB-DC-1000-02_rev-9.pdf	BPEP_ABB_01520811	BPEP_ABB_01520811
204	Asbuilt-chronology.zip?3478-BSB-DC-1000-02_REV-11.pdf	BPEP_ABB_01520812	BPEP_ABB_01520812
205	Asbuilt-chronology.zip?3478-BSB-DC-1091-01-rev-0.pdf	BPEP_ABB_01520813	BPEP_ABB_01520813
206	Asbuilt-chronology.zip?3478-BSB-DC-1091-01-rev-2.pdf	BPEP_ABB_01520814	BPEP_ABB_01520814
207	Asbuilt-chronology.zip?3478-BSB-DC-1091-02-rev-0.pdf	BPEP_ABB_01520815	BPEP_ABB_01520815
208	Asbuilt-chronology.zip?3478-BSB-DC-1091-02-rev-2.pdf	BPEP_ABB_01520816	BPEP_ABB_01520816
209	RE: Atlantis Documentum Status;Steel, William JM. <William.Steel@bp.com>;McDougall, John (Orion Engineering) <John.McDougall@bp.com>; Peloubet, Robert R <Robert.Peloubet@bp.com>; Broman, William H(HOU) <william.broman@bp.com>; Mack, John G <John.Mack@bp.com>;Blackmon, Jennifer (SWIFT TECHNICAL SERVICES) <Jennifer.Blackmon@bp.com>; Burns, Johanne (ORION ENGINEERING) <Johanne.Burns@bp.com>; Fuess, Lawrence J. (Orion) <Lawrence.Fuess@bp.com>	BPEP_ABB_01521046	BPEP_ABB_01521047
210	RE: Atlantis Document Control - Path Forward;Blackmon, Jennifer (SWIFT TECHNICAL SERVICES) <Jennifer.Blackmon@bp.com>;Mack, John G <John.Mack@bp.com>;Atlantis Document Control <AtlantisDocumentControl@bp.com>; Curtis, Tinikka (NES) <Tinikka.Curtis@bp.com>	BPEP_ABB_01521049	BPEP_ABB_01521053
211	DC1-Phase SS1 Subsea P&IDs, As-Built (Currently Installed) P&IDs.PDF	BPEP_ABB_01521419	BPEP_ABB_01521419
212	RE: Rev O asbuilt drawings of the recent umbilical installations.;Sustala, Dennis R <Dennis.Sustala@bp.com>;Sustala, Dennis R <Dennis.Sustala@bp.com>; Boles, Julie (Technip) <jboles@technip.com>;Morry, Brett (Unknown Business Partner) <Brett.Morry@bp.com>; Weber, Dana (R&D Technical) <Dana.Weber@bp.com>; Mack, John G <John.Mack@bp.com>; Webb, Simon P <Simon.Webb@bp.com>; Silva, Stanley S <Stanley.Silva@bp.com>; Stancich, Mark (PCS) <mstancich@projectconsulting.com>; Berg, Shawn V (Technip) <svberg@technip.com>	BPEP_ABB_01521617	BPEP_ABB_01521620
213	FW: Atlantis Document Control Proposal - Path Forward;Naseman, Bill E;Broman, William H(HOU) <william.broman@bp.com>;	BPEP_ABB_01524631	BPEP_ABB_01524634
214	FW: P&IDs For Operations;Duff, Barry C <Barry.Duff@bp.com>;Naseman, Bill E <nasemawe@bp.com>; Broman, William H(HOU) <bromanwh@bp.com>;	BPEP_ABB_01524673	BPEP_ABB_01524675
215	RE: Documentation;Garland, Mike L <Mike.Garland@bp.com>;Taylor, Alastair <alastair.taylor@uk.bp.com>; Naseman, Bill E <Bill.Naseman@BP.com>;Smit, Dirk <Dirk.Smit@BP.com>; Gum, C. Wayne <Wayne.Gum@BP.com>; Oneto, Rick <Rick.Oneto@BP.com>; Lowe, Jon D <Jon.Lowe@BP.com>; Carter, Donnie J <Donnie.Carter@BP.com>	BPEP_ABB_01524689	BPEP_ABB_01524690
216	RE: Documentation;Smit, Dirk <Dirk.Smit@bp.com>;Naseman, Bill E <Bill.Naseman@bp.com>; Taylor, Alastair <alastair.taylor@uk.bp.com>; Oneto, Rick <Rick.Oneto@bp.com>; Lowe, Jon D <Jon.Lowe@bp.com>; Garland, Mike L <Mike.Garland@bp.com>; Carter, Donnie J	BPEP_ABB_01524691	BPEP_ABB_01524692
217	Atlantis Waterflood HAZID Recommendations.doc	BPEP_ABB_01526143	BPEP_ABB_01526145
218	MoC Safety Hazard Analysis and Operability Review Form Atlantis hazard Review O2 ScavengerRev 0.doc	BPEP_ABB_01526146	BPEP_ABB_01526147
219	Process Hazards Analysis and Layer of Protection Analysis	BPEP_ABB_01526369	BPEP_ABB_01526426
220	Atlantis Incidents from GoM HSSB Web Site.png	BPEP_ABB_01526878	BPEP_ABB_01526878
221	Manifolds South 2A and 4A Handover Package; 1440-34-HU-MA-0346(Man2A&4A); Rev. 2	BPEP_ABB_01527671	BPEP_ABB_01527974

Sawyer-000064

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
222	Integrated Atlantis/Thunder Horse Projects Team - Document Review & Approval Requirements - 1410-30-QA-SP-1503.pdf	BPEP_ABB_01530671	BPEP_ABB_01530685
223	2009 09 23 Submission of As-Builts to TAOS.doc	BPEP_ABB_01616761	BPEP_ABB_01616761
224	API RP 14J documentation information.xls;Carter, Donnie J <Donnie.Carter@bp.com>;Grant, James R <James.Grant@bp.com>;Smit, Dirk <Dirk.Smit@bp.com>;DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>;Broman, William H(HOU) <william.broman@bp.com>;Babooram, Seepersad <Seepersad.Babooram@bp.com>;Sustala, Dennis R <Dennis.Sustala@bp.com>;	BPEP_ABB_01623978	BPEP_ABB_01623978
225	API documentation information.xls	BPEP_ABB_01623979	BPEP_ABB_01623979
226	Atlantis Application Sequences - DWOP/PSS - DWOP HISTORY Table.doc	BPEP_ABB_01623981	BPEP_ABB_01623997
227	Atlantis Additional information;Shah, Arvind <Arvind.Shah@mms.gov>;Sustala, Dennis R <Dennis.Sustala@bp.com>;Kruise, Bernard <Bernard.Kruise@mms.gov>;Trosclair, Troy <Troy.Trosclair@mms.gov>	BPEP_ABB_01624013	BPEP_ABB_01624013
228	RE: Telephone Requests;Shah, Arvind <Arvind.Shah@mms.gov>;Sustala, Dennis R <Dennis.Sustala@bp.com>;Kruise, Bernard <Bernard.Kruise@mms.gov>	BPEP_ABB_01624045	BPEP_ABB_01624045
229	As-Built Drawings for the MMS;DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>;Sustala, Dennis R <Dennis.Sustala@bp.com>;	BPEP_ABB_01624067	BPEP_ABB_01624067
230	RE: Atlantis Platform as-built drawings;Sustala, Dennis R;Butler, Myles (KBR) <Myles.Butler@mustangeng.com>;DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>;Quintos, Roberto M <Roberto.Quintos@bp.com>;Johnson, Grant C <Grant.Johnson@bp.com>;Grant, James R	BPEP_ABB_01624068	BPEP_ABB_01624072
231	RE: Atlantis Platform as-built drawings;Sustala, Dennis R;LPekel@eagle.org;	BPEP_ABB_01624334	BPEP_ABB_01624336
232	RE: Geo-century Reports;Ward, Charlos C <Charlos.Ward@bp.com>;McDougall, John (Orion Engineering) <John.McDougall@bp.com>;Schwebel, John <John.Schwebel@bp.com>;Peloubet, Robert R <Robert.Peloubet@bp.com>;Sustala, Dennis R <Dennis.Sustala@bp.com>;Benson, Steve S <Steve.Benson@bp.com>	BPEP_ABB_01626084	BPEP_ABB_01626085
233	As-Built;Domangue, Bryan <Bryan.Domangue@boemre.gov>;Sustala, Dennis R <Dennis.Sustala@bp.com>;Lan, Christy M <Christy.Lan@boemre.gov>;Wilson, Amy <Amy.Wilson@boemre.gov>;Bertrand, Vanessa M <Vanessa.Bertrand@boemre.gov>;Trosclair, Troy <Troy.Trosclair@boemre.gov>;Kruise, Bernard <Bernard.Kruise@boemre.gov>	BPEP_ABB_01626121	BPEP_ABB_01626121
234	FW: Acceptance Test Certificate Question;Shea, Twyla (TECHNIP) <Twyla.Shea@bp.com>;Mack, John G <John.Mack@bp.com>;Huntoon, George G (Clover) <George.Huntoon@bp.com>;Weber, Dana (R&D Technical) <Dana.Weber@bp.com>	BPEP_ABB_01626577	BPEP_ABB_01626577
235	Fwd: Audit forms;Weber, Dana (R&D Technical) <Dana.Weber@bp.com>;JOJackson@technip.com;	BPEP_ABB_01626870	BPEP_ABB_01626870
236	Memo To Charlos Ward RE MMS Outstanding Questions (Christy Lan; Dated 6/23/2010)	BPEP_ABB_01627034	BPEP_ABB_01627037
237	Document Control Procedure	BPEP_ABB_01631097	BPEP_ABB_01631120
238	DSME MOM	BPEP_ABB_01676492	BPEP_ABB_01676493
239	DSME MOM	BPEP_ABB_01676495	BPEP_ABB_01676496
240	DSME MOM	BPEP_ABB_01676525	BPEP_ABB_01676528
241	DSME MOM	BPEP_ABB_01676532	BPEP_ABB_01676535
242	DSME MOM	BPEP_ABB_01676553	BPEP_ABB_01676557
243	DSME MOM	BPEP_ABB_01676558	BPEP_ABB_01676559
244	DSME MOM	BPEP_ABB_01676579	BPEP_ABB_01676582
245	DSME MOM	BPEP_ABB_01676584	BPEP_ABB_01676587
246	DSME MOM	BPEP_ABB_01676588	BPEP_ABB_01676589

Sawyer-000065

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
247	DSME MOM	BPEP_ABB_01676590	BPEP_ABB_01676591
248	DSME MOM	BPEP_ABB_01676600	BPEP_ABB_01676611
249	DSME MOM	BPEP_ABB_01676618	BPEP_ABB_01676628
250	DSME MOM	BPEP_ABB_01676640	BPEP_ABB_01676647
251	DSME MOM	BPEP_ABB_01676652	BPEP_ABB_01676660
252	DSME MOM	BPEP_ABB_01676667	BPEP_ABB_01676677
253	DSME MOM	BPEP_ABB_01676684	BPEP_ABB_01676696
254	DSME MOM	BPEP_ABB_01676701	BPEP_ABB_01676714
255	DSME MOM	BPEP_ABB_01676728	BPEP_ABB_01676740
256	DSME MOM	BPEP_ABB_01676744	BPEP_ABB_01676744
257	DSME MOM	BPEP_ABB_01676770	BPEP_ABB_01676770
258	DSME MOM	BPEP_ABB_01676800	BPEP_ABB_01676800
259	DSME MOM	BPEP_ABB_01676838	BPEP_ABB_01676838
260	DSME MOM	BPEP_ABB_01676867	BPEP_ABB_01676867
261	DSME MOM	BPEP_ABB_01676899	BPEP_ABB_01676899
262	DSME MOM	BPEP_ABB_01676934	BPEP_ABB_01676934
263	DSME MOM	BPEP_ABB_01676955	BPEP_ABB_01676958
264	DSME MOM	BPEP_ABB_01676959	BPEP_ABB_01676959
265	DSME MOM	BPEP_ABB_01676960	BPEP_ABB_01676965
266	DSME MOM	BPEP_ABB_01676966	BPEP_ABB_01676966
267	DSME MOM	BPEP_ABB_01676967	BPEP_ABB_01676970
268	DSME MOM	BPEP_ABB_01676971	BPEP_ABB_01676971
269	DSME MOM	BPEP_ABB_01676972	BPEP_ABB_01676981
270	DSME MOM	BPEP_ABB_01676982	BPEP_ABB_01677006
271	DSME MOM	BPEP_ABB_01677008	BPEP_ABB_01677011
272	DSME MOM	BPEP_ABB_01677045	BPEP_ABB_01677062
273	DSME MOM	BPEP_ABB_01677063	BPEP_ABB_01677064
274	DSME MOM	BPEP_ABB_01677079	BPEP_ABB_01677086
275	DSME MOM	BPEP_ABB_01677087	BPEP_ABB_01677087

Sawyer-000066

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
276	DSME MOM	BPEP_ABB_01677088	BPEP_ABB_01677092
277	DSME MOM	BPEP_ABB_01677093	BPEP_ABB_01677093
278	DSME MOM	BPEP_ABB_01677094	BPEP_ABB_01677103
279	DSME MOM	BPEP_ABB_01677104	BPEP_ABB_01677104
280	DSME MOM	BPEP_ABB_01677105	BPEP_ABB_01677108
281	DSME MOM	BPEP_ABB_01677109	BPEP_ABB_01677115
282	DSME MOM	BPEP_ABB_01677116	BPEP_ABB_01677120
283	DSME MOM	BPEP_ABB_01677121	BPEP_ABB_01677138
284	DSME MOM	BPEP_ABB_01677139	BPEP_ABB_01677139
285	DSME MOM	BPEP_ABB_01677140	BPEP_ABB_01677148
286	DSME MOM	BPEP_ABB_01677149	BPEP_ABB_01677151
287	DSME MOM	BPEP_ABB_01677152	BPEP_ABB_01677152
288	DSME MOM	BPEP_ABB_01677153	BPEP_ABB_01677167
289	DSME MOM	BPEP_ABB_01677171	BPEP_ABB_01677171
290	DSME MOM	BPEP_ABB_01677172	BPEP_ABB_01677176
291	DSME MOM	BPEP_ABB_01677177	BPEP_ABB_01677177
292	DSME MOM	BPEP_ABB_01677178	BPEP_ABB_01677180
293	DSME MOM	BPEP_ABB_01677181	BPEP_ABB_01677181
294	DSME MOM	BPEP_ABB_01677182	BPEP_ABB_01677185
295	DSME MOM	BPEP_ABB_01677187	BPEP_ABB_01677187
296	DSME MOM	BPEP_ABB_01677188	BPEP_ABB_01677189
297	DSME MOM	BPEP_ABB_01677190	BPEP_ABB_01677190
298	DSME MOM	BPEP_ABB_01677193	BPEP_ABB_01677193
299	DSME MOM	BPEP_ABB_01677196	BPEP_ABB_01677196
300	DSME MOM	BPEP_ABB_01677199	BPEP_ABB_01677199
301	DSME MOM	BPEP_ABB_01677202	BPEP_ABB_01677202
302	DSME MOM	BPEP_ABB_01677210	BPEP_ABB_01677213
303	DSME MOM	BPEP_ABB_01677214	BPEP_ABB_01677218
304	DSME MOM	BPEP_ABB_01677219	BPEP_ABB_01677220

Sawyer-000067

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
305	DSME MOM	BPEP_ABB_01677221	BPEP_ABB_01677223
306	DSME MOM	BPEP_ABB_01677224	BPEP_ABB_01677225
307	DSME MOM	BPEP_ABB_01677226	BPEP_ABB_01677226
308	DSME MOM	BPEP_ABB_01677227	BPEP_ABB_01677236
309	DSME MOM	BPEP_ABB_01677237	BPEP_ABB_01677237
310	DSME MOM	BPEP_ABB_01677238	BPEP_ABB_01677247
311	DSME MOM	BPEP_ABB_01677249	BPEP_ABB_01677252
312	DSME MOM	BPEP_ABB_01677253	BPEP_ABB_01677253
313	DSME MOM	BPEP_ABB_01677254	BPEP_ABB_01677261
314	DSME MOM	BPEP_ABB_01677264	BPEP_ABB_01677265
315	DSME MOM	BPEP_ABB_01677266	BPEP_ABB_01677268
316	DSME MOM	BPEP_ABB_01677269	BPEP_ABB_01677271
317	DSME MOM	BPEP_ABB_01677272	BPEP_ABB_01677272
318	DSME MOM	BPEP_ABB_01677275	BPEP_ABB_01677277
319	DSME MOM	BPEP_ABB_01677278	BPEP_ABB_01677279
320	DSME MOM	BPEP_ABB_01677280	BPEP_ABB_01677281
321	DSME MOM	BPEP_ABB_01677282	BPEP_ABB_01677282
322	DSME MOM	BPEP_ABB_01677283	BPEP_ABB_01677283
323	DSME MOM	BPEP_ABB_01677284	BPEP_ABB_01677285
324	DSME MOM	BPEP_ABB_01677286	BPEP_ABB_01677288
325	DSME MOM	BPEP_ABB_01677289	BPEP_ABB_01677290
326	DSME MOM	BPEP_ABB_01677292	BPEP_ABB_01677293
327	DSME MOM	BPEP_ABB_01677294	BPEP_ABB_01677294
328	DSME MOM	BPEP_ABB_01677295	BPEP_ABB_01677295
329	DSME MOM	BPEP_ABB_01677296	BPEP_ABB_01677297
330	DSME MOM	BPEP_ABB_01677300	BPEP_ABB_01677301
331	DSME MOM	BPEP_ABB_01677302	BPEP_ABB_01677303
332	DSME MOM	BPEP_ABB_01677304	BPEP_ABB_01677305
333	DSME MOM	BPEP_ABB_01677306	BPEP_ABB_01677307

Sawyer-000068

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
334	DSME MOM	BPEP_ABB_01677308	BPEP_ABB_01677309
335	DSME MOM	BPEP_ABB_01677310	BPEP_ABB_01677311
336	DSME MOM	BPEP_ABB_01677312	BPEP_ABB_01677314
337	DSME MOM	BPEP_ABB_01677318	BPEP_ABB_01677320
338	DSME MOM	BPEP_ABB_01677321	BPEP_ABB_01677324
339	DSME MOM	BPEP_ABB_01677329	BPEP_ABB_01677331
340	DSME MOM	BPEP_ABB_01677332	BPEP_ABB_01677334
341	DSME MOM	BPEP_ABB_01677335	BPEP_ABB_01677337
342	DSME MOM	BPEP_ABB_01677338	BPEP_ABB_01677340
343	DSME MOM	BPEP_ABB_01677341	BPEP_ABB_01677343
344	DSME MOM	BPEP_ABB_01677345	BPEP_ABB_01677348
345	DSME MOM	BPEP_ABB_01677349	BPEP_ABB_01677351
346	DSME MOM	BPEP_ABB_01677352	BPEP_ABB_01677355
347	DSME MOM	BPEP_ABB_01677357	BPEP_ABB_01677360
348	DSME MOM	BPEP_ABB_01677364	BPEP_ABB_01677367
349	DSME MOM	BPEP_ABB_01677369	BPEP_ABB_01677375
350	DSME MOM	BPEP_ABB_01677381	BPEP_ABB_01677385
351	DSME MOM	BPEP_ABB_01677389	BPEP_ABB_01677394
352	DSME MOM	BPEP_ABB_01677395	BPEP_ABB_01677406
353	DSME MOM	BPEP_ABB_01677422	BPEP_ABB_01677434
354	DSME MOM	BPEP_ABB_01677445	BPEP_ABB_01677445
355	DSME MOM	BPEP_ABB_01677446	BPEP_ABB_01677453
356	DSME MOM	BPEP_ABB_01677463	BPEP_ABB_01677463
357	DSME MOM	BPEP_ABB_01677478	BPEP_ABB_01677484
358	DSME MOM	BPEP_ABB_01677485	BPEP_ABB_01677485
359	DSME MOM	BPEP_ABB_01677486	BPEP_ABB_01677493
360	DSME MOM	BPEP_ABB_01677497	BPEP_ABB_01677540
361	DSME MOM	BPEP_ABB_01677541	BPEP_ABB_01677541
362	DSME MOM	BPEP_ABB_01677560	BPEP_ABB_01677562

Sawyer-000069

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
363	DSME MOM	BPEP_ABB_01677563	BPEP_ABB_01677563
364	DSME MOM	BPEP_ABB_01677564	BPEP_ABB_01677570
365	DSME MOM	BPEP_ABB_01677571	BPEP_ABB_01677571
366	DSME MOM	BPEP_ABB_01677579	BPEP_ABB_01677585
367	DSME MOM	BPEP_ABB_01677598	BPEP_ABB_01677598
368	DSME MOM	BPEP_ABB_01677608	BPEP_ABB_01677608
369	DSME MOM	BPEP_ABB_01677609	BPEP_ABB_01677638
370	DSME MOM	BPEP_ABB_01677639	BPEP_ABB_01677639
371	DSME MOM	BPEP_ABB_01677662	BPEP_ABB_01677665
372	DSME MOM	BPEP_ABB_01677667	BPEP_ABB_01677667
373	DSME MOM	BPEP_ABB_01677668	BPEP_ABB_01677674
374	DSME MOM	BPEP_ABB_01677675	BPEP_ABB_01677675
375	DSME MOM	BPEP_ABB_01677676	BPEP_ABB_01677686
376	DSME MOM	BPEP_ABB_01677687	BPEP_ABB_01677687
377	DSME MOM	BPEP_ABB_01677688	BPEP_ABB_01677696
378	DSME MOM	BPEP_ABB_01677699	BPEP_ABB_01677699
379	DSME MOM	BPEP_ABB_01677700	BPEP_ABB_01677706
380	DSME MOM	BPEP_ABB_01677707	BPEP_ABB_01677732
381	DSME MOM	BPEP_ABB_01677733	BPEP_ABB_01677733
382	DSME MOM	BPEP_ABB_01677747	BPEP_ABB_01677747
383	DSME MOM	BPEP_ABB_01677748	BPEP_ABB_01677754
384	DSME MOM	BPEP_ABB_01677781	BPEP_ABB_01677783
385	DSME MOM	BPEP_ABB_01677784	BPEP_ABB_01677784
386	DSME MOM	BPEP_ABB_01677785	BPEP_ABB_01677790
387	DSME MOM	BPEP_ABB_01677791	BPEP_ABB_01677820
388	DSME MOM	BPEP_ABB_01677821	BPEP_ABB_01677821
389	DSME MOM	BPEP_ABB_01677822	BPEP_ABB_01677826
390	DSME MOM	BPEP_ABB_01677827	BPEP_ABB_01677827
391	DSME MOM	BPEP_ABB_01677841	BPEP_ABB_01677841

Sawyer-000070

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
392	DSME MOM	BPEP_ABB_01677889	BPEP_ABB_01677890
393	DSME MOM	BPEP_ABB_01677892	BPEP_ABB_01677914
394	DSME MOM	BPEP_ABB_01677915	BPEP_ABB_01677916
395	DSME MOM	BPEP_ABB_01677943	BPEP_ABB_01677946
396	DSME MOM	BPEP_ABB_01677947	BPEP_ABB_01677947
397	DSME MOM	BPEP_ABB_01677952	BPEP_ABB_01677959
398	DSME MOM	BPEP_ABB_01677960	BPEP_ABB_01677960
399	DSME MOM	BPEP_ABB_01677968	BPEP_ABB_01677994
400	DSME MOM	BPEP_ABB_01678003	BPEP_ABB_01678003
401	DSME MOM	BPEP_ABB_01678004	BPEP_ABB_01678005
402	DSME MOM	BPEP_ABB_01678032	BPEP_ABB_01678032
403	DSME MOM	BPEP_ABB_01678052	BPEP_ABB_01678052
404	DSME MOM	BPEP_ABB_01678053	BPEP_ABB_01678058
405	DSME MOM	BPEP_ABB_01678060	BPEP_ABB_01678060
406	DSME MOM	BPEP_ABB_01678061	BPEP_ABB_01678065
407	DSME MOM	BPEP_ABB_01678072	BPEP_ABB_01678074
408	DSME MOM	BPEP_ABB_01678075	BPEP_ABB_01678114
409	DSME MOM	BPEP_ABB_01678118	BPEP_ABB_01678118
410	DSME MOM	BPEP_ABB_01678119	BPEP_ABB_01678124
411	DSME MOM	BPEP_ABB_01678127	BPEP_ABB_01678127
412	DSME MOM	BPEP_ABB_01678128	BPEP_ABB_01678132
413	DSME MOM	BPEP_ABB_01678133	BPEP_ABB_01678133
414	DSME MOM	BPEP_ABB_01678134	BPEP_ABB_01678148
415	DSME MOM	BPEP_ABB_01678179	BPEP_ABB_01678180
416	DSME MOM	BPEP_ABB_01678181	BPEP_ABB_01678181
417	DSME MOM	BPEP_ABB_01678182	BPEP_ABB_01678186
418	DSME MOM	BPEP_ABB_01678187	BPEP_ABB_01678224
419	DSME MOM	BPEP_ABB_01678256	BPEP_ABB_01678257
420	DSME MOM	BPEP_ABB_01678258	BPEP_ABB_01678258

Sawyer-000071

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
421	DSME MOM	BPEP_ABB_01678259	BPEP_ABB_01678268
422	DSME MOM	BPEP_ABB_01678269	BPEP_ABB_01678269
423	DSME MOM	BPEP_ABB_01678271	BPEP_ABB_01678306
424	DSME MOM	BPEP_ABB_01678307	BPEP_ABB_01678307
425	DSME MOM	BPEP_ABB_01678308	BPEP_ABB_01678313
426	DSME MOM	BPEP_ABB_01678314	BPEP_ABB_01678314
427	DSME MOM	BPEP_ABB_01678315	BPEP_ABB_01678321
428	DSME MOM	BPEP_ABB_01678322	BPEP_ABB_01678324
429	DSME MOM	BPEP_ABB_01678325	BPEP_ABB_01678325
430	DSME MOM	BPEP_ABB_01678326	BPEP_ABB_01678331
431	DSME MOM	BPEP_ABB_01678338	BPEP_ABB_01678344
432	DSME MOM	BPEP_ABB_01678346	BPEP_ABB_01678378
433	DSME MOM	BPEP_ABB_01678379	BPEP_ABB_01678379
434	DSME MOM	BPEP_ABB_01678380	BPEP_ABB_01678387
435	DSME MOM	BPEP_ABB_01678394	BPEP_ABB_01678394
436	DSME MOM	BPEP_ABB_01678395	BPEP_ABB_01678401
437	DSME MOM	BPEP_ABB_01678402	BPEP_ABB_01678404
438	DSME MOM	BPEP_ABB_01678405	BPEP_ABB_01678408
439	DSME MOM	BPEP_ABB_01678409	BPEP_ABB_01678409
440	DSME MOM	BPEP_ABB_01678410	BPEP_ABB_01678413
441	DSME MOM	BPEP_ABB_01678424	BPEP_ABB_01678424
442	DSME MOM	BPEP_ABB_01678426	BPEP_ABB_01678428
443	DSME MOM	BPEP_ABB_01678439	BPEP_ABB_01678439
444	DSME MOM	BPEP_ABB_01678449	BPEP_ABB_01678477
445	DSME MOM	BPEP_ABB_01678478	BPEP_ABB_01678478
446	DSME MOM	BPEP_ABB_01678479	BPEP_ABB_01678483
447	DSME MOM	BPEP_ABB_01678506	BPEP_ABB_01678506
448	DSME MOM	BPEP_ABB_01678507	BPEP_ABB_01678512
449	DSME MOM	BPEP_ABB_01678513	BPEP_ABB_01678515

Sawyer-000072

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
450	DSME MOM	BPEP_ABB_01678516	BPEP_ABB_01678516
451	DSME MOM	BPEP_ABB_01678517	BPEP_ABB_01678519
452	DSME MOM	BPEP_ABB_01678520	BPEP_ABB_01678520
453	DSME MOM	BPEP_ABB_01678521	BPEP_ABB_01678525
454	DSME MOM	BPEP_ABB_01678526	BPEP_ABB_01678530
455	DSME MOM	BPEP_ABB_01678545	BPEP_ABB_01678545
456	DSME MOM	BPEP_ABB_01678546	BPEP_ABB_01678550
457	DSME MOM	BPEP_ABB_01678573	BPEP_ABB_01678573
458	DSME MOM	BPEP_ABB_01678574	BPEP_ABB_01678581
459	DSME MOM	BPEP_ABB_01678582	BPEP_ABB_01678584
460	DSME MOM	BPEP_ABB_01678585	BPEP_ABB_01678585
461	FMC/Honeywell Service Notification	BPEP_ABB_02176312	BPEP_ABB_02176317
462	FW_Atlantis GC787 A Platform, G23579 - As Built Drawings.msg	BPEP_ABB_03415377	BPEP_ABB_03415377
463	Atlantis Start up Timeline	BPEP_ABB_03415448	BPEP_ABB_03415449
464	[untitled drawing procedure flowchart]	BPEP_ABB_03415450	BPEP_ABB_03415452
465	topsidesAtlantis Documentation Review.doc	BPEP_ABB_03415484	BPEP_ABB_03415485
466	TRANSMITTAL AT-BPO-DWB-T-1884.pdf	BPEP_ABB_03416977	BPEP_ABB_03416977
467	[DSME Drawing List for Structure Drawings]	BPEP_ABB_03416986	BPEP_ABB_03416991
468	[Excel list of exact installation dates of all subsea equipment from beginning and beyond first oil]	BPEP_ABB_03417130	BPEP_ABB_03417130
469	BP Atlantis System Handover Process.doc	BPEP_ABB_03418455	BPEP_ABB_03418455
470	1440-31-HU-MA-0008.pdf Well DC-114 Handover package (Rev. 0)	BPEP_ABB_03422917	BPEP_ABB_03423036
471	1440-31-HU-MA-0005.pdf DC-111 Well Handover Package (Rev. 0)	BPEP_ABB_03423040	BPEP_ABB_03423152
472	RE: Documentum document.mht; RE: Documentum document; Curtis, Tinikka (NES); Moreno, Brian (Technip) <moreb193313606@bp.com>;	BPEP_ABB_03442551	BPEP_ABB_03442551
473	1440-10-SB-MA-0008 Rev. A (For Information) Equipment Catalog FMC Technologies	BPEP_ABB_03442552	BPEP_ABB_03442625
474	RE: Atlantis Document Control - Path Forward.mht; RE: Atlantis Document Control - Path Forward; Curtis, Tinikka (NES); Broman, William H(HOU) <bromanwh@bp.com>; Naseman, Bill E (Bill.Naseman@bp.com) <nasemawe@bp.com>; Garland, Mike L (Mike.Garland@bp.com) <garlm1@bp.com>; Mack, John G <mackjg1@bp.com>; Powell, Simon A (Simm.Powell@bp.com) <powes5@bp.com>	BPEP_ABB_03442706	BPEP_ABB_03442710
475	1440-35-SB-SP-3033.ZIP?1440-35-SB-SP-3033.pdf; Site Integration and Commissioning (SIC) Procedure For Atlantis Subsea Master Control Unit (SCU) and Topsides Interface Project	BPEP_ABB_03442830	BPEP_ABB_03442864
476	Gulf of Mexico Production RFA/MOC Document & Tag Tracking Procedure	BPEP_ABB_03443054	BPEP_ABB_03443064
477	RE PIDs For Operations.doc	BPEP_ABB_03444956	BPEP_ABB_03444959

Sawyer-000073

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
478	1400-10-PM-PR-8004 .doc; Deepwater Gulf of Mexico Production Standards for CAD Drawings	BPEP_ABB_03445256	BPEP_ABB_03445264
479	PHASE 2B Reg Plan REV 0.zip?Appendix 14 Atlantis Phase 2B HSSE Mark Pierce Chart.pdf	BPEP_ABB_03446543	BPEP_ABB_03446543
480	PHASE 2B Reg Plan REV 0.zip?Appendix 15 Major Projects HSSE Gary Barker Chart.pdf	BPEP_ABB_03446544	BPEP_ABB_03446544
481	PHASE 2B Reg Plan REV 0.zip?Appendix 16 Atlantis Asset HSSE Dean Rayburn Chart.pdf	BPEP_ABB_03446545	BPEP_ABB_03446545
482	HSSE Metrics Definitions and data source 070328.xls	BPEP_ABB_03446554	BPEP_ABB_03446554
483	05b - HSSE Mgmt. Framework and Swim Lanes 070319 v0.ppt	BPEP_ABB_03446692	BPEP_ABB_03446703
484	Hunter email to BOEMRE RE Atlantis	BPEP_ABB_03457947	BPEP_ABB_03457948
485	Atlantis_Overall SS1 MOC_SS-06-013_Rev3 (COMPLETE with Signatures).ZIP?Atlantis_Overall SS1 MOC_SS-06-013_Rev3 (COMPLETE with Signatures) (2).pdf	BPEP_ABB_03459700	BPEP_ABB_03459739
486	Holding Tank Hazard Review_MOC 09_0344_Jan 21 2009.ZIP?Holding Tank Hazard Review_MOC 09_0344_Jan 21 2009.xls	BPEP_ABB_03474788	BPEP_ABB_03474788
487	3478-BSB-PA-0156_Rev_0.pdf	BPEP_ABB_03476285	BPEP_ABB_03476397
488	Fw: 3478-ETR-3566 - Installation/Commissioning Procedure, Test Procedure, BP Atlantis Smarttool to SCM Communication Test (BPAT2710A) - Rev C.htm; Fw: 3478-ETR-3566 - Installation/Commissioning Procedure, Test Procedure, BP Atlantis Smarttool to SCM Communication Test (BPAT2710A) - Rev C; WDean@technip.com; Orr, Scotty <scotty.orr@bp.com>; Powell, Kevin J <kevin.powell@bp.com>; Oza, Nita <nita.oza@bp.com>; Young, Brian J <brian.j.young@bp.com>	BPEP_ABB_03476551	BPEP_ABB_03476552
489	HSE Bulletin OPG - Forearm laceration.pdf	BPEP_ABB_03479291	BPEP_ABB_03479293
490	HAZID - GoM FJ IM program - 07-08-08.doc	BPEP_ABB_03479966	BPEP_ABB_03479974
491	RE: Updated: TPU Boards.htm; RE: Updated: TPU Boards; Oza, Nita; McIntosh, Brian <Brian.McIntosh@fmcti.com>; Noe, Robert <Robert.Noel@fmcti.com>; THAI, LINH <LINH.THAI@fmcti.com>; Reiff, Greg <Gregory.Reiff@fmcti.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Chan, Roy <Roy.Chan@bp.com>; Bradley, George <GEORGE.BRADLEY@fmcti.com>	BPEP_ABB_03481773	BPEP_ABB_03481775
492	Subsea Controls.zip?1440-35-SB-DG-0136-001.pdf	BPEP_ABB_03481776	BPEP_ABB_03481776
493	Subsea Controls.zip?1440-35-SB-DG-0136-002.pdf	BPEP_ABB_03481777	BPEP_ABB_03481777
494	Subsea Controls.zip?1440-35-SB-DG-0133-001.pdf	BPEP_ABB_03481778	BPEP_ABB_03481778
495	Subsea Controls.zip?1440-35-SB-DG-0133.pdf	BPEP_ABB_03481779	BPEP_ABB_03481779
496	Subsea Controls.zip?1440-35-SB-DG-0166-001.pdf	BPEP_ABB_03481780	BPEP_ABB_03481780
497	Subsea Controls.zip?1440-35-SB-DG-0166-002.pdf	BPEP_ABB_03481781	BPEP_ABB_03481781
498	Subsea Controls.zip?1440-35-SB-DG-0132.pdf	BPEP_ABB_03481782	BPEP_ABB_03481782
499	GoM HSSE Incident Report Short Form.doc	BPEP_ABB_03481819	BPEP_ABB_03481820
500	Re: Can you help me please?.htm; Re: Can you help me please?; SVBerg@technip.com; Oza, Nita <Nita.Oza@bp.com>;	BPEP_ABB_03482191	BPEP_ABB_03482191
501	GoM HSSE Incident Report Short Form - MV Harvey Discovery.doc	BPEP_ABB_03482262	BPEP_ABB_03482263
502	GoM HSSE Incident Report Short Form - MV Harvey Discovery.doc	BPEP_ABB_03482265	BPEP_ABB_03482266
503	BOA Deep-C - First Aid - 11-14-08.doc	BPEP_ABB_03482294	BPEP_ABB_03482295
504	Atlantis Subsea Document Control P&ID Trail - Context.ZIP?Atlantis Subsea Document Control PID Trail - Context.ppt	BPEP_ABB_03484532	BPEP_ABB_03484541

Sawyer-000074

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
505	BP DOC. NO. 1440-36-HU-MA-0112, Rev 0.pdf [Earliest Revision of Electrical Umbilical E4 Subsea Well Handover Package]	BPEP_ABB_03487974	BPEP_ABB_03488157
506	[Original third part of first two volumes of the later 7 volume handover package.] Rev. 0 BP Doc. No. 1440-34-HU-MA-0296, Rev. 0-Vol2.pdf	BPEP_ABB_03490650	BPEP_ABB_03490806
507	1440-34-HU-MA-0295 Rev. 0-Vol1-Part2of 2.pdf; Handover package, earlier version of Volume 1; Flowlines P & T	BPEP_ABB_03491465	BPEP_ABB_03491724
508	BP DOC. NO. 1440-34-HU-MA-0295 Rev. 0-Vol1-Part1of 2.pdf	BPEP_ABB_03491725	BPEP_ABB_03492020
509	RE Audit Question (242).msg; RE: Audit Question; Silva, Stanley S <Stanley.Silva@bp.com>; Ward, Charles C <Charles.Ward@bp.com>; Mack, John G <John.Mack@bp.com>;	BPEP_ABB_03494303	BPEP_ABB_03494305
510	GCI-PR0144-1041-RP.PDF	BPEP_ABB_03494306	BPEP_ABB_03494336
511	MMS Interview.msg?All Atlantis HSE.htm	BPEP_ABB_03494817	BPEP_ABB_03495189
512	Atlantis Pre-Startup PHSSER & PSSR.msg?Atlantis Pre-start PHSSER close-out session.ppt	BPEP_ABB_03496565	BPEP_ABB_03496582
513	Atlantis Pre-Startup PHSSER & PSSR.msg?Atlantis Pre-start PSSR Feedback.ppt	BPEP_ABB_03496583	BPEP_ABB_03496596
514	Addendum to Offshore MCS SIC 1440-35-SB-SP-3033	BPEP_ABB_03359421	BPEP_ABB_03359430
515	SAFETY SHUTDOWN LOGIC DRAWINGS 1440-35-SB-DG-3020 THRU 3030	BPEP_ABB_03359747	BPEP_ABB_03359757
516	Atlantis Hull Documentation History	BPEP_ABB_03497412	BPEP_ABB_03497414
517	RE: Operations Managers Meeting and Higher ;Peloubet, Robert R <Robert.Peloubet@bp.com>; Oneto, Rick <Rick.Oneto@BP.com>; DeJohn, Kenneth P <Kenneth.DeJohn@BP.com>; Ragan, Frank (Mustang Engineering) <frank.ragan@mustangeng.com>; Brown, Bill (James W) <Bill.Brown@BP.com>; Maxwell, Steve J (Gregg Valdes) <Steve.Maxwell@BP.com>; Roades, Barth L <Barth.Roades@BP.com>; LaRue, Kelley A <Kelley.LaRue@BP.com>; Carter, Donnie J <Donnie.Carter@BP.com>; Rayburn, Dean M <Dean.Rayburn@BP.com>; Goodrich, Stephanie <Stephanie.Goodrich@BP.com>; Gray, Thomas B <Tom.Gray@BP.com>; Judice, Ted P <Ted.Judice@BP.com>	BPEP_ABB_03498616	BPEP_ABB_03498620
518	RE: CTR Close Out and GOC Sign off;Ragan, Frank <Frank.Ragan@bp.com>; Snook, John <John.Snook@bp.com>; Bish, Steven S <Steven.Bish@bp.com>; Roades, Barth L <Barth.Roades@bp.com>; Clanahan, Matt <Matt.Clanahan@bp.com>; DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>	BPEP_ABB_03500129	BPEP_ABB_03500135
519		BPEP_ABB_03500136	BPEP_ABB_03500148
520	Preliminary Reliability Report - 1QTR 2010;Gipson, Latoya M <Latoya.Gipson@bp.com>; Powell, Joe <Joe.Powell@bp.com>; Harrison, Rickey <Rickey.Harrison@bp.com>; Ball, Michael A <michael.ball@bp.com>; Alexander, Edward K <alexanek@bp.com>; Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Drennan, Doug <Doug.Drennan@bp.com>; Longley, James <JD.Longley@bp.com>; Orr, Scotty <Scotty.Orr@bp.com>; Powell, Kevin J <Kevin.Powell@bp.com>; DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>; Seibert, Bob <Bob.Seibert@bp.com>	BPEP_ABB_03500435	BPEP_ABB_03500436
521	Atlantis Equipment Reliability Report	BPEP_ABB_03500437	BPEP_ABB_03500437
522	1QTR 2010 - Atlantis Equipment Reliability Report.xls	BPEP_ABB_03500438	BPEP_ABB_03500438
523	RE: Controllers failure, causing OSD;Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Ragan, Frank <Frank.Ragan@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Roades, Barth L <Barth.Roades@bp.com>; Gardner, Alton P <Alton.Gardner@bp.com>; Ross, Jim <Jim.Ross@bp.com>; DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>	BPEP_ABB_03501101	BPEP_ABB_03501102
524	Atlantis Dewatering & Flowback HAZOP 1440-10-HS-RP-6027 Rev 0	BPEP_ABB_03501870	BPEP_ABB_03501886
525	RE: Status Update Saturday 12:25;Maxwell, Steve J (Gregg Valdes) <Steve.Maxwell@bp.com>; Oneto, Rick <Rick.Oneto@BP.com>; Todd, Simon P <Simon.Todd@BP.com>; Taylor, Alastair <alastair.taylor@uk.bp.com>; Smit, Dirk <Dirk.Smit@BP.com>; Lowe, Jon D <Jon.Lowe@BP.com>; LaRue, Kelley A <Kelley.LaRue@BP.com>; Gum, C. Wayne <Wayne.Gum@BP.com>; DeJohn, Kenneth P <Kenneth.DeJohn@BP.com>; Ragan, Frank <Frank.Ragan@BP.com>; Russell, Virgil <Virgil.Russell@BP.com>; McCollum, Chris <chris.mccollum@BP.com>; Gold, Henry (Udelhoven) <Henry.Gold@BP.com>; Jackson, Newton C <Newton.Jackson@BP.com>	BPEP_ABB_03502155	BPEP_ABB_03502157
526	MEI PROJECT DOCUMENT CONTROL PROCEDURE DOCUMENT NUMBER: 1400-10-AD-PR-0214	BPEP_ABB_03505155	BPEP_ABB_03505174

Sawyer-000075

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
527	HSE Confirmation of Handover R1.xls	BPEP_ABB_03505519	BPEP_ABB_03505519
528	Documents for Review/ Approval to load to Handover - FW: TEST Documents - Part of the "Honeywell" documents;Turner, Beth <Beth.Turner@mustangeng.com>; Stewart, Earline <Earline.Stewart@mustangeng.com>; McNease, Kristy (Gregg Valdes) <kristy.mcnease@bp.com>; Garland, Mike L <Mike.Garland@bp.com>	BPEP_ABB_03505549	BPEP_ABB_03505550
529	TEST SPF Spreadsheet.xls	BPEP_ABB_03505551	BPEP_ABB_03505551
530	FW: Progress Report - ATL Subsea Document Control;Gregg, Andrew (Gregg Valdes & Assoc) <Andrew.Gregg@bp.com>; Fortune, Steve <Steve.Fortune@bp.com>; Garland, Mike L <Mike.Garland@bp.com>	BPEP_ABB_03505624	BPEP_ABB_03505626
531	FW: Deletion of files;Lim, Connie <Connie.Lim@mustangeng.com>; Garland, Mike L <garlm@bp.com>;	BPEP_ABB_03506877	BPEP_ABB_03506878
532	RE: OPS MOC-0018 close-out;DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>; Roades, Barth L <Barth.Roades@BP.com>; Garland, Mike L <Mike.Garland@BP.com>; Gregg, Andrew (Gregg Valdes & Assoc) <Andrew.Gregg@BP.com>; Dicken, Stan (Gregg Valdes) <Stan.Dicken@BP.com>; Brown, Bill (James W) <Bill.Brown@BP.com>; LaRue, Kelley A <Kelley.LaRue@BP.com>; Boudreaux, Percy J (Udelhoven) <Percy.Boudreaux@BP.com>	BPEP_ABB_03507190	BPEP_ABB_03507193
533	RE: Apparent confusion in records management request;Naseman, Bill E <Bill.Naseman@bp.com>; Smit, Dirk <Dirk.Smit@BP.com>; Taylor, Alastair <alastair.taylor@uk.bp.com>; Garland, Mike L <Mike.Garland@BP.com>;	BPEP_ABB_03508573	BPEP_ABB_03508574
534	First Oil Handover Manuals;McDougall, John (Orion Engineering); Peloubet, Robert R <Robert.Peloubet@bp.com>;	BPEP_ABB_03509457	BPEP_ABB_03509457
535	RE: P1 and M2 and 4 SH1;Weber, Dana (R&D Technical) <Dana.Weber@bp.com>; Patt, Darren L <Darren.Patt@BP.com>; Oza, Nita <Nita.Oza@BP.com>	BPEP_ABB_03512790	BPEP_ABB_03512790
536	[SH-1 attached to patt email to Weber]	BPEP_ABB_03512806	BPEP_ABB_03512808
537	RE: SH1 for Man2 and Man4;Weber, Dana (R&D Technical) <Dana.Weber@bp.com>; Oza, Nita <Nita.Oza@BP.com>;	BPEP_ABB_03512810	BPEP_ABB_03512810
538	RE: TRACTION E-mail: Incident Report Approval Required;Broman, William H(HOU) <william.broman@bp.com>; Mabile, Nere <Nere.Mabile@BP.com>; Oza, Nita <Nita.Oza@BP.com>;	BPEP_ABB_03512848	BPEP_ABB_03512850
539	RE: TRACTION E-mail: Incident Report Approval Required;Broman, William H(HOU) <william.broman@bp.com>; Oza, Nita <Nita.Oza@BP.com>;	BPEP_ABB_03512909	BPEP_ABB_03512911
540	RE: pod testing;Oza, Nita; Malone, Garrick <Garrick.Malone@bp.com>;	BPEP_ABB_03513064	BPEP_ABB_03513065
541	RE: 143?;Oza, Nita; Broman, William H(HOU) <william.broman@bp.com>;	BPEP_ABB_03513069	BPEP_ABB_03513069
542	RE: DC 124 re start;Oza, Nita; Oneto, Rick <Rick.Oneto@bp.com>; Todd, Simon P <Simon.Todd@bp.com>; Broman, William H(HOU) <william.broman@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Partridge, April L <April.Partridge@bp.com>; Angel, Keith F <keith.angel@bp.com>; Singh, Pramod K <Pramod.Singh@bp.com>; Harrison, Rickey <Rickey.Harrison@bp.com>; Orr, Scotty <Scotty.Orr@bp.com>	BPEP_ABB_03513072	BPEP_ABB_03513072
543	Pw: DC 124 valve opening;Oza, Nita; Angel, Keith F <keith.angel@bp.com>; Carlson, Brian H <Brian.Carlson@bp.com>;	BPEP_ABB_03513076	BPEP_ABB_03513076
544	DC 124 valve opening;Oza, Nita; Young, Brian J <Brian.J.Young@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>;	BPEP_ABB_03513077	BPEP_ABB_03513077
545	2008 HSSE Training Calendar	BPEP_ABB_03514409	BPEP_ABB_03514420
546	RE: Black start on the 10th Feb;Ragan, Frank <Frank.Ragan@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Vass, Malcolm (Technip) <mcvass@technip.com>; Reynolds, Brandon (Technip) <brreynolds@technip.com>	BPEP_ABB_03514570	BPEP_ABB_03514575
547	Well Systems Integration and Design Engineering Gas Lift HAZOP Final Report Rev A 1440-20-HS-Rp-6021	BPEP_ABB_03517664	BPEP_ABB_03517678
548	Right-of-Way Pipeline Permit Application; Volume 1	BPEP_ABB_03528206	BPEP_ABB_03528356
549	Application for Lease Term Pipeline System	BPEP_ABB_03530514	BPEP_ABB_03530516
550	Atlantis Lease Term System Application [Binder filed with application]	BPEP_ABB_03530524	BPEP_ABB_03530643

Sawyer-000076

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
551	Revised Lease-Term Application	BPEP_ABB_03531043	BPEP_ABB_03531139
552	Lease-Term Application	BPEP_ABB_03531287	BPEP_ABB_03531427
553	1440-30-SB-DG-0613	BPEP_ABB_03532233	BPEP_ABB_03532240
554	PSS Application Volume 2 [legible and in order]	BPEP_ABB_03534013	
555	RE: CD;McVass@technip.com;Sustala, Dennis R <Dennis.Sustala@bp.com>;Edwards, Jonell (Comsys) <Jonell.Edwards@bp.com>	BPEP_ABB_03541909	BPEP_ABB_03541910
556	RE: Check Valve In Water Wells ;Sustala, Dennis R;Jack Schneider' <Jack@JSchneiderltd.com>;	BPEP_ABB_03544605	BPEP_ABB_03544606
557	RE: Atlantis DOCD Email #3;Sustala, Dennis R;phillip.cutler@ccteam.com';'roy.barrett@ccteam.com'	BPEP_ABB_03544951	BPEP_ABB_03544957
558	RE: Flowline Rupture Calculations for the MMS;Sustala, Dennis R;Bargas, Connie L <Connie.Bargas@BP.com>;	BPEP_ABB_03545067	BPEP_ABB_03545070
559	Platform vs Vessel - PSS;Sustala, Dennis R;jack.schneider@jschneiderLTD.com'; 'marsha.barnett@jschneiderltd.com';	BPEP_ABB_03549057	BPEP_ABB_03549057
560	FW: DHPT Time-Stamp Problems DC-124;Sun, Henry (TX57) <Henry.Sun2@honeywell.com>;Young, Brian J <Brian.J.Young@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>;Rogers, Steven (TX57) <steven.rogers@honeywell.com>; Oza, Nita <Nita.Oza@BP.com>	BPEP_ABB_03553990	BPEP_ABB_03553990
561	RE: DHPT Time-Stamp Problems DC-124;Rogers, Steven (TX57) <steven.rogers@honeywell.com>;Carlson, Brian H <Brian.Carlson@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>; Ragan, Frank <Frank.Ragan@bp.com>; mickey.colham@fmcti.com;Oza, Nita <Nita.Oza@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Whitehead, David K (Technip) <David.Whitehead@bp.com>; mvass@technip.com; Reynolds, Brandon (Technip) <brreynolds@technip.com>; Sun, Henry H (HONEYWELL IND. AUTO. and CNTR) <Henry.Sun2@honeywell.com>	BPEP_ABB_03554200	BPEP_ABB_03554201
562	FW: DC 124 re start;Broman, William H(HOU) <william.broman@bp.com>;Oza, Nita <Nita.Oza@BP.com>; Berger, Ron K (Manatee) <ron.berger@BP.com>;	BPEP_ABB_03554824	BPEP_ABB_03554825
563	Nightly Report 01/09/08;Brandon Reynolds <brandon.reynolds@mac.com>;Oza, Nita <ozan@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>;Byrd, Wanda J <wanda.byrd@bp.com>; Taylor, Elton Z <Elton.Taylor@bp.com>; Orr, Scotty <scotty.orr@bp.com>	BPEP_ABB_03554858	BPEP_ABB_03554858
564	RE: Strange Choke Behavior;Berger, Ron K (Manatee) <ron.berger@bp.com>;Young, Brian J <Brian.J.Young@BP.com>; Oza, Nita <Nita.Oza@BP.com>; Ragan, Frank <Frank.Ragan@BP.com>;Dean, Wayne (TECHNIP) <wdean@technip.com>; Reynolds, Brandon (Technip) <brreynolds@technip.com>; 'Rogers, Steven (TX57)' <steven.rogers@honeywell.com>	BPEP_ABB_03554885	BPEP_ABB_03554885
565	FAMs during SD today;Young, Brian J <Brian.J.Young@bp.com>;Berger, Ron K (Manatee) <ron.berger@bp.com>; Oza, Nita <Nita.Oza@bp.com>;Hickok, Doyle D (Technip) <Doyle.Hickok@bp.com>; Mundorff, Jan <Jan.Mundorff@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>; Reynolds, Brandon (Technip) <brreynolds@technip.com>	BPEP_ABB_03559338	BPEP_ABB_03559338
566	RE: Nightly Report 01/08/08;Berger, Ron K (Manatee) <ron.berger@bp.com>;Young, Brian J <Brian.J.Young@BP.com>; 'Brandon Reynolds' <brandon.reynolds@mac.com>; Oza, Nita <Nita.Oza@BP.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>;Byrd, Wanda J <Wanda.Byrd@BP.com>; Taylor, Elton Z <Elton.Taylor@BP.com>; Orr, Scotty <Scotty.Orr@BP.com>	BPEP_ABB_03559371	BPEP_ABB_03559372
567	DC-124 valve malfunctions;Byrd, Wanda J <Wanda.Byrd@bp.com>;Oza, Nita <Nita.Oza@bp.com>;Taylor, Elton Z <Elton.Taylor@bp.com>	BPEP_ABB_03559378	BPEP_ABB_03559378
568	RE: DC 124 valve opening;Angel, Keith F <keith.angel@bp.com>;Oza, Nita <Nita.Oza@bp.com>; Byrd, Wanda J <Wanda.Byrd@bp.com>;Carlson, Brian H <Brian.Carlson@bp.com>; Sharp, Jerry <jerry.Sharp@bp.com>	BPEP_ABB_03559386	BPEP_ABB_03559386
569	Fw: DC 124 valve opening;Oza, Nita;Ragan, Frank <Frank.Ragan@bp.com>;	BPEP_ABB_03560226	BPEP_ABB_03560226
570	FW: Subsea vavles opening without request;Oza, Nita;Berger, Ron K (Manatee) <ron.berger@bp.com>; Hickok, Doyle D (Technip) <Doyle.Hickok@bp.com>; Broman, William H(HOU) <william.broman@bp.com>;	BPEP_ABB_03560235	BPEP_ABB_03560235
571	RE: Oil in Annulus on 822#9 due to ABV1&2 leaking;Rotolo, Anthony <anthony.rotolo@bp.com>;Knott, Ryan (TECHNIP) <rknott@technip.com>;Courville, Jeffery J <jeffery.Courville@bp.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03570183	BPEP_ABB_03570188
572	RE: Open One-Touch Action items;Broman, William H(HOU) <william.broman@bp.com>;Oza, Nita <Nita.Oza@bp.com>;	BPEP_ABB_03575416	BPEP_ABB_03575420

Sawyer-000077

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
573	RE: BP Atlantis Single Board Computer Issues Meeting Minutes - 8/12/08; Kennelley, Kevin J <kennelkj@bp.com>; Broman, William H (HOU) <william.broman@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Peloubet, Robert R <Robert.Peloubet@bp.com>	BPEP_ABB_03586257	BPEP_ABB_03586261
574	RE: BP Atlantis Single Board Computer Issues Meeting Minutes - 8/12/08; Broman, William H (HOU) <william.broman@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Kennelley, Kevin J <kennelkj@bp.com>; Peloubet, Robert R <Robert.Peloubet@bp.com>; Broman, William H (HOU) <william.broman@bp.com>	BPEP_ABB_03586423	BPEP_ABB_03586427
575	RE: update of RCA effort; Fleming, Ray H <Ray.Fleming@bp.com>; McIntosh, Brian' <Brian.McIntosh@fmcti.com>; Berg, Johnny <Johnny.Berg@fks.fmcti.com>; ERIK.BRISTOL@fmcti.com; Brooks, Randy R. (QA) <RandyR.Brooks@fmcti.com>; Chan, Roy <Roy.Chan@bp.com>; Furneaux, Dale (FMC) <dale.furneaux@fmcti.com>; Jampala, Shalima <Shalima.Jampala@fmcti.com>; Leal, JJ (FMC) <jj.leal@fmcti.com>; Nehra, Aneet <Aneet.Nehra@fmcti.com>; Oza, Nita <Nita.Oza@bp.com>; Gregory.Reiff@fmcti.com; Berger, Ron K (Manatee) <ron.berger@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>; LINH.THA1@fmcti.com; Broman, William H (HOU) <william.broman@bp.com>;	BPEP_ABB_03586626	BPEP_ABB_03586627
576	RE: Atlantis --- SBC RCA update; Berger, Ron K (Manatee) <ron.berger@bp.com>; Snow, Jeff R <Jeff.Snow@BP.com>; Chan, Roy <Roy.Chan@BP.com>; Little, Joshua J <Joshua.Little@BP.com>; Herrmann, Douglas T <Douglas.Herrmann@BP.com>; Gipson, Les <Les.Gipson@BP.com>; Oza, Nita <Nita.Oza@BP.com>	BPEP_ABB_03586679	BPEP_ABB_03586681
577	DC113 Software Upgrade and Failed Card Installation; Berger, Ron K (Manatee) <ron.berger@bp.com>; Leal, JJ (FMC) <lealjj@bp.com>; Velampambil, Benoj <Benoj.Velampambil@fmcti.com>; HARDEE, ROBERT <ROBERT.HARDEE@fmcti.com>; Herrmann, Douglas T <Douglas.Herrmann@BP.com>; Snow, Jeff R <Jeff.Snow@BP.com>; Oza, Nita <Nita.Oza@BP.com>; Furneaux, Dale (FMC) <dale.furneaux@fmcti.com>; Young, Brian J <younbx@bp.com>	BPEP_ABB_03586694	BPEP_ABB_03586694
578	FW: DC-122 information; Berger, Ron K (Manatee) <ron.berger@bp.com>; Snow, Jeff R <Jeff.Snow@BP.com>; Herrmann, Douglas T <herrmadt@bp.com>; Gipson, Les <gipsll@bp.com>; Mack, John G <mackjg1@bp.com>; Oza, Nita <ozan@bp.com>	BPEP_ABB_03586695	BPEP_ABB_03586696
579	Atlantis --- SBC RCA update; Chan, Roy <Roy.Chan@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>; Hartley, Jamie (FMC) <hartjq@bp.com>; Furneaux, Dale (FMC) <furnd0@bp.com>	BPEP_ABB_03586853	BPEP_ABB_03586853
580	BPEP_ABB_03586854.txt ROOT CAUSE ANALYSIS (RCA) PROCESS GUIDELINE	BPEP_ABB_03586854	BPEP_ABB_03586866
581	BPEP_ABB_03586867.txt	BPEP_ABB_03586867	BPEP_ABB_03586867
582	RE: 122 Info; Chan, Roy <Roy.Chan@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03587019	BPEP_ABB_03587026
583	RE: 122 Info; Cotton, Steven L <Steven.Cotton@bp.com>; Snow, Jeff R <Jeff.Snow@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Little, Joshua J <Joshua.Little@bp.com>	BPEP_ABB_03587047	BPEP_ABB_03587059
584	RE: 122 Info; Snow, Jeff R <Jeff.Snow@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>; Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03587091	BPEP_ABB_03587096
585	RE: 122 Info; Sun, Henry (TX57) <Henry.Sun2@honeywell.com>; Cotton, Steven L <Steven.Cotton@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Furneaux, Dale (FMC) <Dale.Furneaux@fmcti.com>; Snow, Jeff R <Jeff.Snow@BP.com>; Oza, Nita <nita.oza@bp.com>; Young, Brian J <Brian.J.Young@BP.com>	BPEP_ABB_03587114	BPEP_ABB_03587118
586	BPEP_ABB_03587119.txt	BPEP_ABB_03587119	BPEP_ABB_03587119
587	RE: 122 Info; Berger, Ron K (Manatee) <ron.berger@bp.com>; Cotton, Steven L <Steven.Cotton@BP.com>; Snow, Jeff R <Jeff.Snow@BP.com>; Chan, Roy <Roy.Chan@BP.com>; Young, Brian J <Brian.J.Young@BP.com>; Oza, Nita <Nita.Oza@BP.com>	BPEP_ABB_03587212	BPEP_ABB_03587216
588	FW: 122 Info; Berger, Ron K (Manatee) <ron.berger@bp.com>; Velampambil, Benoj <Benoj.Velampambil@fmcti.com>; ERIK.BRISTOL@fmcti.com; Leal, JJ (FMC) <lealjj@bp.com>; Furneaux, Dale (FMC) <dale.furneaux@fmcti.com>; HARDEE, ROBERT <ROBERT.HARDEE@fmcti.com>; Chan, Roy <chan34@bp.com>; Cotton, Steven L <cottonsl@bp.com>; Young, Brian J <younbx@bp.com>; Oza, Nita <ozan@bp.com>; Snow, Jeff R <Jeff.Snow@BP.com>	BPEP_ABB_03587243	BPEP_ABB_03587246
589	RE: DC122 A - CONTINUOUS LINE A FAULT; Bristol, Erik <ERIK.BRISTOL@fmcti.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; HARDEE, ROBERT <ROBERT.HARDEE@fmcti.com>; Leal, JJ (FMC) <JJ.Leal@fmcti.com>; Hartley, Jamie (FMC) <Jamie.Hartley@fmcti.com>; Furneaux, Dale (FMC) <Dale.Furneaux@fmcti.com>; Velampambil, Benoj <Benoj.Velampambil@fmcti.com>; Chan, Roy <Roy.Chan@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03587310	BPEP_ABB_03587312

Sawyer-000078

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
590	RE: DC122 A - CONTINUOUS LINE A FAULT;Berger, Ron K (Manatee) <ron.berger@bp.com>;Furneaux, Dale (FMC) <furnd0@bp.com>; HARDEE, ROBERT <ROBERT.HARDEE@fmcti.com>; Leal, JJ (FMC) <jj.leal@fmcti.com>; Hartley, Jamie (FMC) <jamie.hartley@fmcti.com>; Bristol, Erik <ERIK.BRISTOL@fmcti.com>; Velampambil, Benoj <Benoj.Velampambil@fmcti.com>;Chan, Roy <Roy.Chan@BP.com>; Young, Brian J <Brian.J.Young@BP.com>; Oza, Nita <Nita.Oza@BP.com>	BPEP_ABB_03587313	BPEP_ABB_03587315
591	RE: DC-122 SEM A Issues;Herrmann, Douglas T <Douglas.Herrmann@bp.com>;Snow, Jeff R <Jeff.Snow@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Byrd, Wanda J <Wanda.Byrd@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Young, Brian J <Brian.J.Young@bp.com>;Gipson, Les <Les.Gipson@bp.com>; Gardner, Alton P <Alton.Gardner@bp.com>; Ross, Jim <Jim.Ross@bp.com>	BPEP_ABB_03606612	BPEP_ABB_03606612
592	DC-122 SEM A Issues;Byrd, Wanda J <Wanda.Byrd@bp.com>;Berger, Ron K (Manatee) <ron.berger@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Young, Brian J <Brian.J.Young@bp.com>;Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Gardner, Alton P <Alton.Gardner@bp.com>; Ross, Jim <Jim.Ross@bp.com>	BPEP_ABB_03626025	BPEP_ABB_03626025
593	RE: Learnings from DC122 Shut-in on 10-Aug-2008;Herrmann, Douglas T <Douglas.Herrmann@bp.com>;Berger, Ron K (Manatee) <ron.berger@bp.com>; Gipson, Les <Les.Gipson@bp.com>;Harrison, Rickey <Rickey.Harrison@bp.com>; Powell, Joe <Joe.Powell@bp.com>; Ragan, Frank <Frank.Ragan@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Ball, Michael A <michael.ball@bp.com>; Snyder, David D <David.Snyder@bp.com>	BPEP_ABB_03626098	BPEP_ABB_03626098
594	Request for DC113 SBC Software Changes;Berger, Ron K (Manatee) <ron.berger@bp.com>;Hartley, Jamie (FMC) <jamie.hartley@fmcti.com>; 'robert.hardee@fmcti.com'; Furneaux, Dale (FMC) <dale.furneaux@fmcti.com>; Whitehead, David K (Technip) <David.Whitehead@BP.com>; Gutierrez, Daniel <daniel.gutierrez@BP.com>; Malone, Garrick <Garrick.Malone@BP.com>;Oza, Nita <oza@bp.com>; Young, Brian J <younbx@bp.com>; Ragan, Frank <ragafx@bp.com>	BPEP_ABB_03626249	BPEP_ABB_03626249
595	BPEP_ABB_03626250.txt Production Tree#5 DC-113	BPEP_ABB_03626250	BPEP_ABB_03626250
596	RE: DC122 Shut-in Root Cause;Hartley, Jamie <jamie.hartley@fmcti.com>;Berger, Ron K (Manatee) <ron.berger@bp.com>;Broman, William H(HOU) <william.broman@bp.com>; Hughes, John D <john.hughes2@bp.com>; Oza, Nita <Nita.Oza@bp.com>; GEORGE.BRADLEY@fmcti.com; Robert.Noe@fmcti.com	BPEP_ABB_03626300	BPEP_ABB_03626302
597	BPEP_ABB_03626303.txt Product Notification (subsea control module SEM 150 CPU RAM Chip)	BPEP_ABB_03626303	BPEP_ABB_03626304
598	BP Atlantis Single Board Computer Issues Meeting Minutes - 8/12/08;Hartley, Jamie <jamie.hartley@fmcti.com>;Hartley, Jamie (FMC) <jamie.hartley@fmcti.com>; Oza, Nita <oza@bp.com>; Leal, JJ (FMC) <jj.leal@fmcti.com>; scott.leonard@jpkhouston.com; Cotton, Steven L <steven.cotton@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Furneaux, Dale (FMC) <Dale.Furneaux@fmcti.com>; ERIK.BRISTOL@fmcti.com; Young, Brian J <Brian.j.young@bp.com>; Chan, Roy <roy.chan@bp.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>; Fleming, Ray H <ray.fleming@bp.com>; McIntosh, Brian <Brian.McIntosh@fmcti.com>; Curran, Christopher J <christopher.curran@bp.com>;LINH.THAI@fmcti.com; Goggans, Tim <TIM.GOGGANS@fmcti.com>; ROBERT.HARDEE@fmcti.com; Shelagh.Osborn@fmcti.com; Mickey.Coatham@fmcti.com; WESTER, RANDY <RANDY.WESTER@fmcti.com>	BPEP_ABB_03626305	BPEP_ABB_03626307
599	RE: DC113, OCSG 15607, AMV Repair Work Update / Extension Request;Sustala, Dennis R <Dennis.Sustala@bp.com>;Wilson, Amy <Amy.Wilson@mms.gov>;Berger, Ron K (Manatee) <ron.berger@bp.com>; Carlson, Brian H <Brian.Carlson@bp.com>; Angel, Keith F <keith.angel@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Huebel, Ross <Ross.Huebel@bp.com>; Singh, Pramod K <Pramod.Singh@bp.com>; Hughes, John D <john.hughes2@bp.com>; Rayburn, Dean M <Dean.Rayburn@bp.com>; Gutierrez, Daniel <daniel.gutierrez@bp.com>; Roades, Barth L <Barth.Roades@bp.com>; Bish, Steven S <Steven.Bish@bp.com>; Powell, Kevin J <Kevin.Powell@bp.com>; Schutte, Todd M <Todd.Schutte@bp.com>; Broman, William H(HOU) <william.broman@bp.com>	BPEP_ABB_03626319	BPEP_ABB_03626324
600	RE: DC113, OCSG 15607, POD Replacement Update / Extension Request for Continuous Annulus Monitoring;Berger, Ron K (Manatee) <ron.berger@bp.com>;Sustala, Dennis R <Dennis.Sustala@BP.com>; Carlson, Brian H <Brian.Carlson@BP.com>; Angel, Keith F <keith.angel@BP.com>; Oza, Nita <Nita.Oza@BP.com>; Huebel, Ross <Ross.Huebel@BP.com>; Singh, Pramod K <Pramod.Singh@BP.com>; Hughes, John D <john.hughes2@BP.com>; Rayburn, Dean M <Dean.Rayburn@BP.com>; Gutierrez, Daniel <daniel.gutierrez@BP.com>; Roades, Barth L <Barth.Roades@BP.com>; Bish, Steven S <Steven.Bish@BP.com>; Powell, Kevin J <Kevin.Powell@BP.com>; Schutte, Todd M <Todd.Schutte@BP.com>;	BPEP_ABB_03626731	BPEP_ABB_03626736
601	RE: DC113, OCSG 15607, POD Replacement Update / Extension Request for Continuous Annulus Monitoring;Sustala, Dennis R <Dennis.Sustala@bp.com>;Sustala, Dennis R <Dennis.Sustala@bp.com>; Carlson, Brian H <Brian.Carlson@bp.com>; Angel, Keith F <keith.angel@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Huebel, Ross <Ross.Huebel@bp.com>; Singh, Pramod K <Pramod.Singh@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Hughes, John D <john.hughes2@bp.com>; Rayburn, Dean M <Dean.Rayburn@bp.com>; Gutierrez, Daniel <daniel.gutierrez@bp.com>; Roades, Barth L <Barth.Roades@bp.com>; Bish, Steven S <Steven.Bish@bp.com>; Powell, Kevin J <Kevin.Powell@bp.com>; Schutte, Todd M <Todd.Schutte@bp.com>;	BPEP_ABB_03626829	BPEP_ABB_03626834

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
602	RE: DC122 Shut in; Taylor, Elton Z <Elton.Taylor@bp.com>; Little, Joshua J <Joshua.Little@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Byrd, Wanda J <Wanda.Byrd@bp.com>; Boston, Julius <Julius.Boston@bp.com>; Bordelon, Christopher S (Baker Energy) <christopher.bordelon@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Gardner, Alton P <Alton.Gardner@bp.com>; Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Haiko, David J <David.Haiko@bp.com>; Langlinais, Craig S <Craig.Langlinais@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Harrison, Rickey <Rickey.Harrison@bp.com>; McGlothlin, Clifton G <Clifton.McGlothlin@bp.com>; Ohlenforst, Thomas J <Thomas.Ohlenforst@bp.com>; Patt, Darren L <Darren.Patt@bp.com>; Parikh, Manasi J <Manasi.Parikh@bp.com>; Angel, Keith F <keith.angel@bp.com>; Mack, Michael R <Michael.Mack@bp.com>; Snyder, David D <David.Snyder@bp.com>; Ball, Michael A <michael.ball@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>; Ragan, Frank <Frank.Ragan@bp.com>; Laborde, David (Baker/MO) <David.Laborde@bp.com>; Snow, Jeff R <Jeff.Snow@bp.com>; Thomas, Dennis J <Dennis.Thomas@bp.com>	BPEP_ABB_03626943	BPEP_ABB_03626943
603	RE: DC122 Shut in; Little, Joshua J <Joshua.Little@bp.com>; Taylor, Elton Z <Elton.Taylor@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Byrd, Wanda J <Wanda.Byrd@bp.com>; Boston, Julius <Julius.Boston@bp.com>; Bordelon, Christopher S (Baker Energy) <christopher.bordelon@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Gardner, Alton P <Alton.Gardner@bp.com>; Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Haiko, David J <David.Haiko@bp.com>; Langlinais, Craig S <Craig.Langlinais@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Harrison, Rickey <Rickey.Harrison@bp.com>; McGlothlin, Clifton G <Clifton.McGlothlin@bp.com>; Ohlenforst, Thomas J <Thomas.Ohlenforst@bp.com>; Patt, Darren L <Darren.Patt@bp.com>; Parikh, Manasi J <Manasi.Parikh@bp.com>; Angel, Keith F <keith.angel@bp.com>; Mack, Michael R <Michael.Mack@bp.com>; Snyder, David D <David.Snyder@bp.com>; Ball, Michael A <michael.ball@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>; Ragan, Frank <Frank.Ragan@bp.com>; Laborde, David (Baker/MO) <David.Laborde@bp.com>; Snow, Jeff R <Jeff.Snow@bp.com>; Thomas, Dennis J <Dennis.Thomas@bp.com>	BPEP_ABB_03626944	BPEP_ABB_03626944
604	BPEP_ABB_03626945.txt	BPEP_ABB_03626945	BPEP_ABB_03626945
605	ALERT!!! - SPCU SBC Issue; Berger, Ron K (Manatee) <ron.berger@bp.com>; Cotton, Steven L <cottonsl@bp.com>; Herrmann, Douglas T <herrmadt@bp.com>; Gipson, Les <gipsll@bp.com>; Ross, Jim <ross11@bp.com>; Young, Brian J <younbx@bp.com>; Ragan, Frank <ragafx@bp.com>; Orr, Scotty <orrws@bp.com>; Powell, Kevin J <powekj@bp.com>; Oza, Nita <oza@bp.com>; Angel, Keith F <angelkf@bp.com>; Carlson, Brian H <carlsobh@bp.com>; Parikh, Manasi J <parimj@bp.com>; Huebel, Ross <huebrl@bp.com>	BPEP_ABB_03627300	BPEP_ABB_03627300
606	Subsea Test System; Cotton, Steven L <Steven.Cotton@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>; Ragan, Frank <Frank.Ragan@bp.com>	BPEP_ABB_03627310	BPEP_ABB_03627310
607	BPEP_ABB_03627311.txt	BPEP_ABB_03627311	BPEP_ABB_03627311
608	PQ SBC Systemic Failures; WDean@technip.com; mickey.cotham@fmcti.com; Oza, Nita <nita.oza@bp.com>; Whitehead, David K (Technip) <whitdz@bp.com>; Vass, Malcolm (Technip) <mcvass@technip.com>; erik.bristol@fmcti.com; jj.leal@fmcti.co; aneet.nehra@fmcti.com; bruce.maugh@fmcti.com	BPEP_ABB_03627336	BPEP_ABB_03627336
609	BPEP_ABB_03627337.txt PQ SBC Failures	BPEP_ABB_03627337	BPEP_ABB_03627337
610	RE: Subsea Communication Loss Detection on Thunder Horse and Atlantis; RKnot@technip.com; Fleming, Ray H <Ray.Fleming@bp.com>; Curran, Christopher J <Christopher.Curran@bp.com>; SRactliffe@technip.com; Rotolo, Anthony <anthony.rotolo@bp.com>; Hadaegh, Farid <Farid.Hadaegh@bp.com>; Accardo, Angelo C <Angelo.Accardo@bp.com>; Fontenot, Martin L <fontenml@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03627339	BPEP_ABB_03627341
611	FW: Atlantis - update; Chan, Roy <Roy.Chan@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>;	BPEP_ABB_03627433	BPEP_ABB_03627435
612	BPEP_ABB_03627436.txt TPU Location- Event	BPEP_ABB_03627436	BPEP_ABB_03627436
613	RE: Teleconference follow-up; Malone, Garrick <Garrick.Malone@bp.com>; Bristol, Erik <ERIK.BRISTOL@fmcti.com>; Whitehead, David K (Technip) <David.Whitehead@bp.com>; Ragan, Frank <Frank.Ragan@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Sun, Henry H (HONEYWELL IND. AUTO. and CNTR) <Henry.Sun2@honeywell.com>; Gutierrez, Daniel <daniel.gutierrez@bp.com>; Cotham, Mickey <Mickey.Coatham@fmcti.com>; Dean, Wayne (TECHNIP) <wdean@technip.com>	BPEP_ABB_03627539	BPEP_ABB_03627540
614	RE: GC743, DC111 and DC112 Well Communication Reestablished; Sustala, Dennis R <Dennis.Sustala@bp.com>; Wilson, Amy <Amy.Wilson@mms.gov>; Lowe, Jon D <Jon.Lowe@bp.com>; Lowe, Jon D <Jon.Lowe@bp.com>; Taylor, Alastair <alastair.taylor@uk.bp.com>; Roades, Barth L <Barth.Roades@bp.com>; Schutte, Todd M <Todd.Schutte@bp.com>; Powell, Joe <Joe.Powell@bp.com>; Ross, Jim <Jim.Ross@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Harrison, Rickey <Rickey.Harrison@bp.com>; Herrmann, Douglas T <Douglas.Herrmann@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Gardner, Alton P <Alton.Gardner@bp.com>; Bish, David A <David.Bish@bp.com>; Todd, Simon P <Simon.Todd@bp.com>; Sustala, Dennis R <Dennis.Sustala@bp.com>	BPEP_ABB_03627541	BPEP_ABB_03627543

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
615	DC113 gauge 11332 not working; Carlson, Brian H <Brian.Carlson@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03628971	BPEP_ABB_03628972
616	Atlantis TEM SBC Issues; Fleming, Ray H <Ray.Fleming@bp.com>; Kelly, William G <William.Kelly@bp.com>; Curran, Christopher J <Christopher.Curran@bp.com>; Steel, William JM. <William.Steel@bp.com>; Courville, Jeffery J <Jeffery.Courville@bp.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03629803	BPEP_ABB_03629803
617	DC114 DHG Data Problem; Angel, Keith F <keith.angel@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Carlson, Brian H <Brian.Carlson@bp.com>	BPEP_ABB_03629977	BPEP_ABB_03629978
618	RE: DC113 AMV override installed and in operation; Young, Brian J <Brian.J.Young@bp.com>; Angel, Keith F <keith.angel@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Carlson, Brian H <Brian.Carlson@bp.com>	BPEP_ABB_03629981	BPEP_ABB_03629982
619	RE: Smart Tool Logs; Kamau, Polycarp <Polycarp.Kamau@fmcti.com>; Young, Brian J <Brian.J.Young@bp.com>; Leal, JJ (FMC) <jj.leal@fmcti.com>; Nehra, Aneet <Aneet.Nehra@fmcti.com>; Musa, Khalid <Khalid.Musa@fmcti.com>; Oza, Nita <Nita.Oza@bp.com>	BPEP_ABB_03630203	BPEP_ABB_03630204
620	FW: Action Items from the meeting on 10th Sept 2008; McIntosh, Brian <Brian.McIntosh@fmcti.com>; Oza, Nita <Nita.Oza@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>;	BPEP_ABB_03630336	BPEP_ABB_03630339
621	RE: Smart Tool Logs; Thomas, Dennis J <Dennis.Thomas@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Oza, Nita <Nita.Oza@bp.com>;	BPEP_ABB_03642388	BPEP_ABB_03642388
622	BPEP_ABB_03642389.txt	BPEP_ABB_03642389	BPEP_ABB_03642390
623	BPEP_ABB_03642391.txt	BPEP_ABB_03642391	BPEP_ABB_03642394
624	BPEP_ABB_03642395.txt	BPEP_ABB_03642395	BPEP_ABB_03642409
625	BPEP_ABB_03642410.txt	BPEP_ABB_03642410	BPEP_ABB_03642428
626	BPEP_ABB_03642429.txt	BPEP_ABB_03642429	BPEP_ABB_03644047
627	BPEP_ABB_03644048.txt	BPEP_ABB_03644048	BPEP_ABB_03647738
628	BPEP_ABB_03647739.txt	BPEP_ABB_03647739	BPEP_ABB_03651508
629	BPEP_ABB_03651509.txt	BPEP_ABB_03651509	BPEP_ABB_03654381
630	FW: SPCU hardware diagnostic procedure; McIntosh, Brian <Brian.McIntosh@fmcti.com>; Akkoca, Abdullah <Abdullah.Akkoca@fks.fmcti.com>; Oza, Nita <Nita.Oza@bp.com>; Reiff, Greg <Gregory.Reiff@fmcti.com>	BPEP_ABB_03654432	BPEP_ABB_03654433
631	RE: SPCU Hardware Diagnostic Procedure; Cotton, Steven L <Steven.Cotton@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Snow, Jeff R <Jeff.Snow@bp.com>;	BPEP_ABB_03654495	BPEP_ABB_03654496
632	Atlantis Subsea Test Rack and Comms; Cotton, Steven L <Steven.Cotton@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Chan, Roy <Roy.Chan@bp.com>; Sun, Henry H (HONEYWELL IND. AUTO. and CNTR) <Henry.Sun2@honeywell.com>; DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>	BPEP_ABB_03656435	BPEP_ABB_03656435
633	RE: Subsea Alarms; Berger, Ron K (Manatee) <ron.berger@bp.com>; Oza, Nita <Nita.Oza@BP.com>; Byrd, Wanda J <Wanda.Byrd@BP.com>; Young, Brian J <Brian.J.Young@BP.com>; Taylor, Elton Z <Elton.Taylor@BP.com>	BPEP_ABB_03656681	BPEP_ABB_03656681
634	RE: Subsea Controls Comms check; Gipson, Les <Les.Gipson@bp.com>; Oza, Nita <Nita.Oza@bp.com>;	BPEP_ABB_03656770	BPEP_ABB_03656770
635	RE: FMC SPCU/SCU Test Simulator; Cotton, Steven L <Steven.Cotton@bp.com>; Berger, Ron K (Manatee) <bergerrk@bp.com>; Oza, Nita <oza@bp.com>; DeJohn, Kenneth P <dejohnkp@bp.com>; Chan, Roy <chan34@bp.com>	BPEP_ABB_03657231	BPEP_ABB_03657233
636	RE: Friday telecon; Oza, Nita; McIntosh, Brian <Brian.McIntosh@fmcti.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Reiff, Greg <Gregory.Reiff@fmcti.com>; Hartley, Jamie (FMC) <jamie.hartley@fmcti.com>; Akkoca, Abdullah <Abdullah.Akkoca@fks.fmcti.com>; Young, Brian J <Brian.J.Young@bp.com>; Leal, JJ (FMC) <jj.leal@fmcti.com>; Noe, Robert <Robert.Noel@fmcti.com>; Bradley, George <GEORGE.BRADLEY@fmcti.com>;	BPEP_ABB_03657495	BPEP_ABB_03657496
637	Temperature control in the SPCU cabinets; Oza, Nita; Young, Brian J <Brian.J.Young@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Berger, Ron K (Manatee) <ron.berger@bp.com>; Cotton, Steven L <Steven.Cotton@bp.com>; Ragan, Frank <Frank.Ragan@bp.com>;	BPEP_ABB_03657657	BPEP_ABB_03657657
638	RE: Can you help me please?; Oza, Nita; Berg, Shawn V (Technip) <svberg@technip.com>;	BPEP_ABB_03657752	BPEP_ABB_03657753
639	Update on the Atlantis TPU; Oza, Nita; steve.barrett@fmcti.com;	BPEP_ABB_03657842	BPEP_ABB_03657843

Sawyer-000081

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
640	RE: Telecon to discuss BP Atlantis communication failures;Noe, Robert <Robert.Noe@fmcti.com>;McIntosh, Brian <Brian.McIntosh@fmcti.com>; Akkoca, Abdullah <Abdullah.Akkoca@fks.fmcti.com>; Eretveit, Ragnar <Ragnar.Eretveit@fks.fmcti.com>; Berg, Johnny <Johnny.Berg@fks.fmcti.com>; Reiff, Greg <Gregory.Reiff@fmcti.com>; Woods, Matt <Matt.Woods@fmcti.com>; Oza, Nita <Nita.Oza@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Chan, Roy <Roy.Chan@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Leal, JJ (FMC) <JJ.Leal@fmcti.com>; Nehra, Aneet <Aneet.Nehra@fmcti.com>; Kamau, Polycarp <Polycarp.Kamau@fmcti.com>;Bradley, George <GEORGE.BRADLEY@fmcti.com>	BPEP_ABB_03658747	BPEP_ABB_03658748
641	BPEP_ABB_03658749.txt	BPEP_ABB_03658749	BPEP_ABB_03658749
642	BPEP_ABB_03658750.txt Decision Tree with Conditions of Satisfaction	BPEP_ABB_03658750	BPEP_ABB_03658754
643	BPEP_ABB_03658755.txt SPCU C1-3	BPEP_ABB_03658755	BPEP_ABB_03658755
644	RE: SCSSV info;Berger, Ron K (Manatee) <ron.berger@bp.com>;Hui, Christopher <Christopher.Hui@bp.com>; Oza, Nita <Nita.Oza@bp.com>; Young, Brian J <Brian.J.Young@bp.com>;	BPEP_ABB_03658778	BPEP_ABB_03658779
645	RE: Please Read and Respond: Atlantis SPCU RCA;Noe, Robert <Robert.Noe@fmcti.com>;Oza, Nita <Nita.Oza@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Chan, Roy <Roy.Chan@bp.com>; Young, Brian J <Brian.J.Young@bp.com>;McIntosh, Brian <Brian.McIntosh@fmcti.com>; Bradley, George <GEORGE.BRADLEY@fmcti.com>; Leal, JJ (FMC) <JJ.Leal@fmcti.com>; Kamau, Polycarp <Polycarp.Kamau@fmcti.com>; Reiff, Greg <Gregory.Reiff@fmcti.com>	BPEP_ABB_03659787	BPEP_ABB_03659787
646	BPEP_ABB_03659788.txt MOM BP Atlantis Communication Failure Investigation	BPEP_ABB_03659788	BPEP_ABB_03659788
647	BPEP_ABB_03659789.txt	BPEP_ABB_03659789	BPEP_ABB_03659789
648	BPEP_ABB_03659790.txt Decision Tree with Conditions of Satisfaction	BPEP_ABB_03659790	BPEP_ABB_03659794
649	FW: Bridging Procedure for DC121 for USE;Byrd, Wanda J <Wanda.Byrd@bp.com>;Taylor, Elton Z <Elton.Taylor@bp.com>; Gipson, Les <Les.Gipson@bp.com>; Oza, Nita <Nita.Oza@bp.com>;Byrd, Wanda J <Wanda.Byrd@bp.com>	BPEP_ABB_03664106	BPEP_ABB_03664106
650	BPEP_ABB_03664107.txt Bridging Document for DC121 Tree Testing by PQ	BPEP_ABB_03664107	BPEP_ABB_03664119
651	RE: BPAT SEM Time Watchdog;Furneaux, Dale <Dale.Furneaux@fmcti.com>;Nehra, Aneet <Aneet.Nehra@fmcti.com>; Sun, Henry H (HONEYWELL IND. AUTO. and CNTR) <henry.sun2@honeywell.com>; Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>;Leal, JJ (FMC) <JJ.Leal@fmcti.com>; McIntosh, Brian <Brian.McIntosh@fmcti.com>	BPEP_ABB_03664978	BPEP_ABB_03664979
652	RE: BPAT SEM Time Watchdog;Cotton, Steven L <Steven.Cotton@bp.com>;Young, Brian J <Brian.J.Young@bp.com>; Oza, Nita <Nita.Oza@bp.com>;Sun, Henry H (HONEYWELL IND. AUTO. and CNTR) <Henry.Sun2@honeywell.com>; DeJohn, Kenneth P <Kenneth.DeJohn@bp.com>	BPEP_ABB_03664980	BPEP_ABB_03664981
653	RE: Telecon to discuss BP Atlantis Communication failures;Noe, Robert <Robert.Noe@fmcti.com>;Noe, Robert <Robert.Noe@fmcti.com>; McIntosh, Brian <Brian.McIntosh@fmcti.com>; Oza, Nita <Nita.Oza@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Chan, Roy <Roy.Chan@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Bradley, George <GEORGE.BRADLEY@fmcti.com>; Olivares, Al [NETPWR/EMBED/AZ] <Al.Olivares@Emerson.com>; Mostad, Geir <Geir.Mostad@fks.fmcti.com>; Cota, Hector [NETPWR/EMBED/AZ] <Hector.Cota@Emerson.com>; Reiff, Greg <Gregory.Reiff@fmcti.com>; Woods, Matt <Matt.Woods@fmcti.com>; McAlpin, Tim [NETPWR/EMBED/AZ] <Timothy.McAlpin@Emerson.com>; Leal, JJ (FMC) <JJ.Leal@fmcti.com>; Kamau, Polycarp <Polycarp.Kamau@fmcti.com>; Nehra, Aneet <Aneet.Nehra@fmcti.com>;	BPEP_ABB_03665027	BPEP_ABB_03665032
654	BPEP_ABB_03665033.txt Report, Root Cause Analysis (RCA) Subsea- Controls	BPEP_ABB_03665033	BPEP_ABB_03665044
655	BPEP_ABB_03665045.txt	BPEP_ABB_03665045	BPEP_ABB_03665045
656	RE: Telecon to discuss BP Atlantis Communication failures;Noe, Robert <Robert.Noe@fmcti.com>;Noe, Robert <Robert.Noe@fmcti.com>; McIntosh, Brian <Brian.McIntosh@fmcti.com>; Oza, Nita <Nita.Oza@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>; Chan, Roy <Roy.Chan@bp.com>; Young, Brian J <Brian.J.Young@bp.com>; Bradley, George <GEORGE.BRADLEY@fmcti.com>; Olivares, Al [NETPWR/EMBED/AZ] <Al.Olivares@Emerson.com>; Mostad, Geir <Geir.Mostad@fks.fmcti.com>; Cota, Hector [NETPWR/EMBED/AZ] <Hector.Cota@Emerson.com>; Reiff, Greg <Gregory.Reiff@fmcti.com>; Woods, Matt <Matt.Woods@fmcti.com>; McAlpin, Tim [NETPWR/EMBED/AZ] <Timothy.McAlpin@Emerson.com>; Leal, JJ (FMC) <JJ.Leal@fmcti.com>; Kamau, Polycarp <Polycarp.Kamau@fmcti.com>; Nehra, Aneet <Aneet.Nehra@fmcti.com>;	BPEP_ABB_03665276	BPEP_ABB_03665280
657	BPEP_ABB_03665281.txt	BPEP_ABB_03665281	BPEP_ABB_03665281

Sawyer-000082

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
658	BPEP_ABB_03665282.txt	BPEP_ABB_03665282	BPEP_ABB_03665282
659	BPEP_ABB_03665283.txt 4152 BP Atlantis Distribution. Engineering Change Note	BPEP_ABB_03665283	BPEP_ABB_03665283
660	BPEP_ABB_03665284.txt 4152 BP Atlantis Distribution Engineering Change note	BPEP_ABB_03665284	BPEP_ABB_03665284
661	BPEP_ABB_03665285.txt Control System SW BP Atlantis	BPEP_ABB_03665285	BPEP_ABB_03665289
662	BPEP_ABB_03665290.txt Electronic Document, PCB ASSY, Topside SBC Based on Motorola MVME2434	BPEP_ABB_03665290	BPEP_ABB_03665294
663	BPEP_ABB_03665295.txt Installing Bootstrap in KS200 topside SBC	BPEP_ABB_03665295	BPEP_ABB_03665314
664	Ambient Conditions in Generation Module;Young, Brian J <Brian.J.Young@bp.com>;Noc, Robert <Robert.Noe@fmcti.com>; McIntosh, Brian <Brian.McIntosh@fmcti.com>;Oza, Nita <Nita.Oza@bp.com>; Chan, Roy <Roy.Chan@bp.com>; Fleming, Ray H <Ray.Fleming@bp.com>	BPEP_ABB_03667331	BPEP_ABB_03667332
665	Well System Integration and Design Engineering Services Contract BPA-00-01772	T-USA000001	T-USA000087
666	Global Contract for Provision of Engineering & Project Management Services for Subsea Facilities BP-EPMS-EP-SS-GA-003	T-USA000088	T-USA000418
667	Amendment No. 1 Contract No. BPA-00-01772	T-USA000419	T-USA000423
668	Amendment No.2 Contract No. BPA-00-01772	T-USA000424	T-USA000429
669	Well Systems Integration & Design Engineering Atlantis North Flank (DC3) Flowlines Installation Scope of Work 1440-34-FN-SOW-0176	T-USA000430	T-USA000980
670	Well System Integration & Design Engineering Services Flowline Fabrication/Installation Specification 1440-34-FL-RP-0168	T-USA000981	T-USA001406
671	Atlantis Sealing Plan TOI-AT-EN-0005 Rev 0	T-USA001407	T-USA001438
672	Quality Audit Report- BP Atlantis Engineering Doc Generation, Review and Approval ENGR-001-IQA-06-0035	T-USA001439	T-USA001460
673	Project Engineering; Technical Doc Numbering System Attachment Section 1- Compnay Codes 3467-AT-PM-0001 Rev 01	T-USA001461	T-USA001467
674	Project Engineering, Technical Doc Numbering System 3467-ST-PM-0001 Rev 1	T-USA001468	T-USA001472
675	Requirements for Technical Docs- Approvals and Signatures; Revision and Issue Description TOI-AT-EN-0001 Rev 3	T-USA001473	T-USA001477
676	Engineering/Project Technical Doc Numbering System YOI-WI-PM-0001 Rev 1	T-USA001478	T-USA001482
677	Technical Reports, Specifications for Design Calculations, ECT. TPUSA-ENG-AT-EN-0001-4	T-USA001483	T-USA001487
678	General Engineering Control of Technical Documents Procedure Rev 4 TPUSA-ENG-PR-EN-0015-4	T-USA001488	T-USA001494
679	Technip Established Drawing Format TPUSA-ENG-WI-DD-0005-1	T-USA001495	T-USA001513
680	DC3 North Flank Development Umbilical Alignment Sheet DC3-F17 Route Layout Rev 1		
681	DC3 North Flank Development Umbilical Alignment Sheet DC3-E4 Route Layout Rev 1		
682	2-Comb Ex30 USC 250		
683	TREE #4 P&ID: 1440-35-SB-DG-0109, Rev. 1	BPEP_ABB_02476465	
684	MANIFOLD 1A P&ID: 1440-35-SB-DG-0388-001; Rev. A	BPEP_ABB_02475603	
685	TREE #4 MECHANICAL: 1440-32-SB-DG-5000, Rev (B)	BPEP_ABB_00764737	
686	MANIFOLD 1A MECHANICAL: 1440-34-HE-DG-9364-001/2; Rev. 1 manifold 1a	BPEP_ABB_00025226	BPEP_ABB_00025227

Sawyer-000083

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
687	PLEM TP, PLET T and FLOWLINE T P&ID: 1440-30-SB-DG-0388-004; Rev. A	BPEP_ABB_02290531	
688	PLEM TP MECHANICAL: 1440-30-SB-DG-0345-001/13	BPEP_ABB_00255479	BPEP_ABB_00255491
689	PLET T MECHANICAL: 1440-34-ST-DG-4003; Rev. 3	BPEP_ABB_03311975	
690	HYDRAULIC UMBILICAL H6 P&ID: 1440-35-SB-DG-0123-001; Rev. 1	BPEP_ABB_02476336	
691	HYDRAULIC UMBILICAL H6 P&ID: 1440-35-SB-DG-0123-002; Rev. 1	BPEP_ABB_02476330	
692	HYDRAULIC UMBILICAL H6 P&ID: 1440-35-SB-DG-0123-003; Rev. 1	BPEP_ABB_02476323	
693	UMBILICAL H6 HANDOVER PACKAGE; 1440-36-HU-MA-0111; Rev. 0	BPEP_ABB_01905406	
694	ELECTRICAL UMBILICAL E4 P&ID: 1440-30-SB-DG-0218-001; Rev. 0	BPEP_ABB_02292464	
695	ELECTRICAL UMBILICAL E4 P&ID: 1440-30-SB-DG-0218-002; Rev. 0	BPEP_ABB_02292434	
696	ELECTRICAL UMBILICAL E4 P&ID: 1440-30-SB-DG-0218-003; Rev. 0	BPEP_ABB_02292430	
697	SUBSEA P&ID;1440-30-SB-DG-0360-02; Rev. 4	BPEP_ABB_02290684	
698	Atlantis PE Certification	FWW253365-001911	FWW253365-01915
699	feb 28 production letter	FWW253365-002150	FWW253365-002151
700	ISPs	FWW253365-002146	FWW253365-002149
701	Piping & Instrument Diagrams - applied redactions	FWW523365-001916	FWW523365-002145
702	7.7.2011 Atlantis Topsides and Hull - Design Construction - Documentum.xls		
703	7.7.2011 Atlantis Subsea Engineering - Documentum.xls		
704	90- Subsurface	BPEP_ABB_00099301	
705	30 - Subsea .xls	BPEP_ABB_00099302	
706	32 Excel-.xls	BPEP_ABB_00099304	
707	32 - Trees .xls	BPEP_ABB_00099304	
708	33- Manifolds .xls	BPEP_ABB_00099305	
709	34 - Pipelines .xls	BPEP_ABB_00099306	
710	35 - Controls .xls	BPEP_ABB_00099307	
711	36- Umbilicals .xls	BPEP_ABB_00099308	
712	37- Riser	BPEP_ABB_00099309	
713	38- Installation	BPEP_ABB_00099310	
714	40- Surfce Well System General	BPEP_ABB_00099311	
715	43- Risers	BPEP_ABB_00099312	

Sawyer-000084

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
716	44-Production Risers Tensioning System	BPEP_ABB_00099313	
717	46- Well Bay Equipment	BPEP_ABB_00099314	
718	47- Installation	BPEP_ABB_00099315	
719	49- Shipping and Handling Equipment	BPEP_ABB_00099316	
720	50- Floating System	BPEP_ABB_00099317	
721	60- Drilling Rig	BPEP_ABB_00099318	
722	70- Installation	BPEP_ABB_00099319	
723	75- Drilling	BPEP_ABB_00099320	
724	85- Operations	BPEP_ABB_00099321	
725	DHSGFinalReport-March2011-tag[1].pdf		
726	Pipe Fracture-Atlantis.pdf		
727	Vendor data requirements	ENG-000290	ENG-000295
728	Book 1 of the Todd Books produced by BPEP	BPEP_ABB_00021427	BPEP_ABB_00021868
728	Book 2 of the Todd Books produced by BPEP	BPEP_ABB_00021869	BPEP_ABB_00022391
729	Book 3 of the Todd Books produced by BPEP	BPEP_ABB_00022392	BPEP_ABB_00022836
730	Book 4 of the Todd Books produced by BPEP	BPEP_ABB_00022837	BPEP_ABB_00023084
731	Book 5 of the Todd Books produced by BPEP	BPEP_ABB_00023085	BPEP_ABB_00023414
732	Book 6 of the Todd Books produced by BPEP	BPEP_ABB_00023415	BPEP_ABB_00023561
733	Book 7 of the Todd Books produced by BPEP	BPEP_ABB_00023562	BPEP_ABB_00023963
734	Book 8 of the Todd Books produced by BPEP	BPEP_ABB_00023964	BPEP_ABB_00024228
735	Book 9 Vol 1 of the Todd Books produced by BPEP	BPEP_ABB_00024229	BPEP_ABB_00024593
736	Book 9 Vol 2 of the Todd Books produced by BPEP	BPEP_ABB_00024594	BPEP_ABB_00024947
737	Book 10 Vol 1 of the Todd Books produced by BPEP	BPEP_ABB_00024948	BPEP_ABB_00025155
738	Book 10 Vol 2 of the Todd Books produced by BPEP	BPEP_ABB_00025169	BPEP_ABB_00025387
739	CD Containing Books 1 - 10 of the Todd Books produced by FWW	FWW00000001	FWW00039533
740	CD Containing Books 1-10 of the Todd Books produced by BPEP	BPEP_ABB_00021427	BPEP_ABB_00025387
741	1440-20-ST-DG-1000-001; Separately identifiable copies of two DCs forward to Arvind Shah by Dennis Sustala as referenced in BPEP_ABB_00107865	BPEP_ABB_01616274	BPEP_ABB_01616722
742	1440-20-ST-DG-1000-001; Separately identifiable copies of two DCs forward to Arvind Shah by Dennis Sustala as referenced in BPEP_ABB_00107865	BPEP_ABB_01615342	BPEP_ABB_01616273
743	Deposition and Exhibits of Ronald Berger		

Sawyer-000085

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
743a	Ex. 213 Resume of Ronald K. Berger (Manatee, Inc.)		
743b	Ex. 214 Documents reviewed by Ron Berger in preparation of Deposition		
743c	Ex. 215 GoM Hurricane Evacuation Plan 1440-85-OP-PR-0009	BPEP_ABB_03674158	BPEP_ABB_03674172
743d	Ex. 216 E-mail from Young to Oza and Berger re: LIM Alarms	BPEP_ABB_03512831	
743e	Ex. 217 E-mail from Broman to Oza re: Subsea Valves Opening without Request	BPEP_ABB_03559672	BPEP_ABB_03559673
743f	Ex. 218 E-mail from Broman to Berger re: FTP pressure SD's?	BPEP_ABB_03554862	
743g	Ex. 219 E-mail from Oza to Lowe re: Shutdowns for DC123, DC124	BPEP_ABB_03513032	
743h	Ex. 220 E-mail from Berger to Fleming, etc. re: Subsea Communication Loss Detection on Thunder Horse and Atlantis	BPEP_ABB_03627348	
743i	Ex. 221 E-mail from FMC to Oza, etc. re: BP Atlantis Single Board Computer Issues Meeting Minutes - 8/4/08	BPEP_ABB_03627334	BPEP_ABB_03627335
743j	Ex. 222 E-mail from FMC to Various re: Board Problems	BPEP_ABB_03626991	
743k	Ex. 223 E-mail from Berger to Broman re: News on FMC Issues	BPEP_ABB_03579591	BPEP_ABB_03579592
743l	Ex. 224 GoM Site Integration and Commissioning (SIC) Procedures for Atlantis Subsea Master Control Station (MCS) Subsea Control Unit (SCU) and Topsides Interface Project 1440-35-SB-SP-3033 Rev. 0	BPEP_ABB_03442830	BPEP_ABB_03442864
743m	Ex. 225 E-mail from Imm to Berger re: Atlantis Documentation Project Emergency	BPEP_ABB_00089380	
743n	Ex. 226 As-Built Register DC1/DC3 - Single Line Tie-In 1440-30-SB-DG-0689 Rev. 2	BPEP_ABB_00088768	
743o	Ex. 227 E-mail from Peloubet to Todd re: Subsea As-Built	BPEP_ABB_00115759	BPEP_ABB_00115760
743p	Ex. 228 E-mail from Berger to Vass re: Honeywell Screens	BPEP_ABB_03586773	BPEP_ABB_03586774
743q	Ex. 229 E-mail from Abbott to Malone, etc. re: Late Atlantis Subsea P&IDs attaching Sector Reports		
743r	Ex. 230 E-mail from Broman to Todd re: 1-Mar-2010 As-built and Handover Review (3478-BSB-DE-1008)	BPEP_ABB_00095746	BPEP_ABB_00095746
744	Deposition and Exhibits of Bill Broman		
744a	Ex. 231 Curriculum Vitae of William H. (Bill) Broman Jr.		
744b	Ex. 232 Ombudsman Confidential Investigation Final Report (Redacted Copy)	OFC OMB 0086 - 0116	
744c	Ex. 233 BP Project MOC #PMOC-GC787-ATL-09-0016 Titled Atlantis Subsea Project Documentation Handover Process	BPEP_ABB_03509234	BPEP_ABB_03509237
744d	Ex. 234 MOC Change Request No. SS-06-013 Rev. 3 Titled Atlantis Overall Subsea Phase 1 (SS1) MOC	BPEP_ABB_00093609	BPEP_ABB_00093640
744e	Ex. 235 Atlantis Subsea Document Control Meeting Presentation Slides	BPEP_ABB_03442729	BPEP_ABB_03442734
744f	Ex. 236 E-mail from Tinikka Curtis to Mike Garland re: Atlantis Subsea DC Proposal attaching presentation	BPEP_ABB_01510373	BPEP_ABB_01510379
744g	Ex. 237 Printout from Excel Spreadsheet - Tab 32 Trees	BPEP_ABB_01510013	BPEP_ABB_01510013
744h	Ex. 238 DLP Handwritten Exhibit re: DC-111 and DC-113 Tree P&IDs		
744i	Ex. 239 Atlantis DC1 - P&IDs	From Todd Book 9	From Todd Book 9
744j	Ex. 240 Atlantis Project GoM Subsea System Handover Package BP Doc. No. 1440-31-HU-MA-0007, Well DC-113-C5 System No. AT1-01-113	BPEP_ABB_01455760	BPEP_ABB_01455884

Sawyer-000086

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
744k	Ex. 241 Atlantis Project GoM Subsea System Handover Package BP Doc. No. 1440-31-HU-MA-0005, Well DC-111-F4 System No. AT1-01-111	BPEP_ABB_00115997	BPEP_ABB_00116109
744l	Ex. 129-A DC113 P&ID Subsea Production Tree with Manual Override Fitted to "AMV" (AS BUILT) 1440-35-SB-DG-0278-001 (copy of previously marked Disc. Exh. #129 w-Witness Handwritten Additions: Black = Normal Flow; Red = if XOV Valves opened erroneously)		
745	Deposition and Exhibits of Tinikka Curtis		
745a	Ex. 94 Deposition Notice		
745b	Ex. 95 Tinikka Curtis Resume		
745c	Ex. 96 Document reviewed by Tinikka Curtis in preparation for deposition: Email from Broman to Huges, etc. re: Atlantis Document Control - Path Forward (attaching Sector Reports)	Produced by BP w/no #s	
745d	Ex. 97 Document reviewed by Tinikka Curtis in preparation for deposition: 9/2/08 Email from Duff to Abbott re: P&IDs for Operations	Abbott 1671-100054/56	
745e	Ex. 98 Document reviewed by Tinikka Curtis in preparation for deposition: E-mail from Technip to N. Oza attaching drawings requested	BPEP_ABB_03482184	
745f	Ex. 99 E-mail from Tinikka Curtis to Malone re: Document	BPEP_ABB_01508906	BPEP_ABB_01508907
745g	Ex. 100 E-mail from Tinikka Curtis to Technip re: Document Request	BPEP_ABB_01508905	
745h	Ex. 101 E-mail from Broman to Hughes, etc. re: Atlantis Document Control - Path Forward attaching Sector Reports	BPEP_ABB_01521407	BPEP_ABB_01521409
745i	Ex. 102 E-mail from Abbott to Vass, etc. re: Test Records in Documentum	BPEP_ABB_01500370	BPEP_ABB_01500371
745j	Ex. 103 E-mail from Tinikka Curtis to Abbott re: DC-1 Closeout Matrix	BPEP_ABB_01510012	
745k	Ex. 104 Pages printed from Closeout Report	BPEP_ABB_01510013	
745l	Ex. 105 RETIRED		
745m	Ex. 106 RETIRED		
745n	Ex. 107 RETIRED		
745o	Ex. 108 E-mail from Abbott to Mack, etc. re: Atlantis Document Numbering Procedure and Drawing Reviews/ Approval by the leads	BPEP_ABB_00095909	
745p	Ex. 109 Email from McDougal/ Orion Engineering to a LONG list of recipients re: New Document Control Set-Up	BPEP_ABB_01497697	BPEP_ABB_01497698
745q	Ex. 110 CD Containing Matric Closeout Sector Reports and Corresponding Email	BPEP_ABB_0152463	BPEP_ABB_0154654
746	Deposition and Exhibits of Kenneth DeJohn		
746a	Exh 201 Resume of Kenneth P. DeJohn		
746b	Ex. 202 Materials Reviewed by Kenneth DeJohn on preparation for his deposition		
746c	Ex. 203 GoM Project Orientation and Procedures Manual (POPM) 1440-21-POPM-PR-0001 Rev. 3	BPEP_ABB_01453338	BPEP_ABB_01453374
746d	Ex. 204 Spreadsheet created by Plaintiffs re: Books 1-6 of Simon Todd Production - Breakdown of Drawings w/ PE Stamps and Marked As-Built		
746e	Ex. 205 Atlantis Integration Project Execution Plan 1440-25-PM-PR-0004 Rev. 0	BPEP_ABB_01531656	BPEP_ABB_01531695
746f	Ex. 206 Spreadsheet created by Plaintiffs re: Books 7-8 of Simon Todd Production - Breakdown of Drawings w/ PE Stamps and Marked As-Built		
746g	Ex. 207 DeJohn E-mail to Yeley and Broman, etc. re: MMS Visit	BPEP_ABB_00115990	BPEP_ABB_00115993

Sawyer-000087

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
746h	Ex. 208 Todd Email Atlantis Response Presentation for April 2010 New Orleans Meeting	BPEP_ABB_00115609	BPEP_ABB_00115657
746i	Ex. 209 MMS Request Letter to Simon Todd/BP	No Barcode - Produced at Depo by BP	No Barcode - Produced at Depo by BP
746j	Ex. 210 DeJohn E-mail re: Pre-Production MMS Walkthrough Update	BPEP_ABB_03503418	BPEP_ABB_03503419
746k	Ex. 211 Smit E-mail to Naseman, etc. re: Documentation	BPEP_ABB_01524691	BPEP_ABB_01524692
746l	Ex. 212 Mustang E-mail to McNease re: Topsides HSB Documents	BPEP_ABB_03505541	BPEP_ABB_03505542
747	Deposition and Exhibits of Barry Duff		
747a	Ex. 111 Resume of Barry. Duff, CCE, PMP		
747b	Ex. 112 E-mail from Naseman to Duff re: Project Closeout for Subsea	BPEP_ABB_00091459	
747c	Ex. 113 E-mail from Smit to Broman and Duff re: Project Closeout	BPEP_ABB_00091289	
747d	Ex. 114 E-mail from Duff to Gregg, etc. re: Proposed Change to Document Numbering Guide	BPEP_ABB_01519199	BPEP_ABB_01519200
747e	Ex. 115 E-mail from Duff to Smit and Broman re: Atlantis Subsea Closeout Identified Issues and Recommendations	BPEP_ABB_00090651	BPEP_ABB_00090652
747f	Ex. 116 E-mail from Duff to Gregg, etc. re: Progress Report - ATL Document Control	BPEP_ABB_01524667	BPEP_ABB_01524669
747g	Ex. 117 TH & ATL Document Control Requirements 1410-30-IM-PR-1501 Rev. 5	BPEP_ABB_00095749	BPEP_ABB_00095781
747h	Ex. 118 E-mail from Duff to Abbott forwarding 8/15/08 e-mail from Duff to Naseman and Broman re: P&IDs for Operations (current procedures out of date)	BPEP_ABB_03466506	BPEP_ABB_03466507
747i	Ex. 119 Well System Integration and Design Engineering Services Contract (Technip Contract) No. BPA-00-01772	BPEP_ABB_00088956	BPEP_ABB_00088961
747j	Ex. 120 Duff E-mail to Broman Forwarding WIFORCASTs	BPEP_ABB_00092374	BPEP_ABB_00092376
747k	Ex. 121 CFR 250.1008 Reports Section		
748	Deposition and Exhibits of Daniel Elmer		
748a	Ex. 152 Handwritten Diagram		
748b	Ex. 153 Letter dated 18th November, 2002 Olver to Browne	BPEP_ABB_03534372	BPEP_ABB_03534379
748c	Ex. 154 Spreadsheet		
748d	Ex. 155 Spreadsheet, Attachment 1		
748e	Ex. 156 Financial Decision Memorandum, BP Exploration	BPEP_ABB_03534351	
748f	Ex. 157 Finance Memorandum, Gulf of Mexico Deepwater Development Business Unit U.S. Capital Expenditure, AtlantisField-Project Definition	BPEP_ABB_03534355	BPEP_ABB_03534357
748g	Ex. 158 Finance Memorandum, Gulf of Mexico Deepwater Development Business Unit U.S. Capital Expenditure, Atlantis Field - Appraisal	BPEP_ABB_03534364	BPEP_ABB_03534365
748h	Ex. 159 Press Release		
748i	Ex. 160 Letter dated 18th November, 2002 Olver to Browne	BPEP_ABB_03534372	BPEP_ABB_03534379
748j	Ex. 161 Define Finance Memorandum, BP America Gulf of Mexico Deepwater SPU, Atlantis North Flank Appraisal, Single Well Tie- Back Appraisal Project	BPEP_ABB_03534315	BPEP_ABB_03534322
748k	Ex. 162 E-mail dated April 12, 2007 Singh to Chuang and others	BPEP_ABB_00094855	

Sawyer-000088

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
748l	Ex. 163 Chapter 12, "Who Cares, It's Done"		
748m	Ex. 164 Article, "Atlantis: turning problems into opportunities"		
748n	Ex. 165 E-mail dated June 12, 2008 Naseman to Todd and others	BPEP_ABB_00090538	
748o	Ex. 166 Execute Finance Memorandum, BP Exploration & Production Inc. - Gulf of Mexico SPU	BPEP_ABB_00092814	BPEP_ABB_00092828
748p	Ex. 167 E-mail dated April 23, 2008 Malone to Karim and others	BPEP_ABB_00091471	BPEP_ABB_00091472
748q	Ex. 168 Execute Finance Memorandum, BP Exploration & Production Inc. Gulf of Mexico SPU, Atlantis Phase 2a	BPEP_ABB_03534340	BPEP_ABB_03534343
748r	Ex. 169 Gulf of Mexico, Atlantis Phase 2b Define FM	BPEP_ABB_03534285	
748s	Ex. 170 Mexico Deepwater SPU, Atlantis Development Well DC121 ("A" Well), Early Miocene Deepening Opportunity	BPEP_ABB_03534306	BPEP_ABB_03534307
748t	Ex. 171 Define Finance Memorandum, BP Exploration & Production Inc - Gulf of Mexico SPU, Atlantis Phase 2b	BPEP_ABB_03534302	BPEP_ABB_03534305
748u	Ex. 172 Statement of Financial Accounting20 Standards No. 69		
748v	Ex. 173 Volume Report	BPEP_ABB_03674173	BPEP_ABB_03674174
748w	Ex. 174 CAPEX Summary Reports		
748x	Ex. 175 Cash Cost Summary		
748y	Ex. 176 BP-BHP JVOA	BPEP_ABB_01627472	BPEP_ABB_01627483
748z	Ex. 177 P&I, Statements		
748aa	Ex. 178 Balance Sheet Statements		
748bb	Ex. 179 Long Term Commercial Financial Memorandum BP Exploration and Production Inc. - Gulf of Mexico SPU, GE LM2500 Standby Gas Turbine Agreement	BPEP_ABB_03534298	BPEP_ABB_03534301
748cc	Ex. 180 Handwritten math figures		
749	Deposition and Exhibits of Linda Gilmer		
749a	Ex. 132 Deposition Notice		
749b	Ex. 133 Letter from Chris Watt to Chris Goodpastor		
749c	Ex. 134 Lease Forms Transmitted For Execution Map Area and Block Number GRCAN-699	BPEP_ABB_01627276	BPEP_ABB_01627287
749d	Ex. 135 Lease Forms Transmitted For ExecutionMap Area and Block Number GRCAN-700	BPEP_ABB_01627312	BPEP_ABB_01627323
749e	Ex. 136 Lease Forms Transmitted For Execution Map Area and Block Number GRCAN-742	BPEP_ABB_01627300	BPEP_ABB_01627311
749f	Ex. 137 Lease Forms Transmitted For ExecutionMap Area and Block Number GRCAN-743	BPEP_ABB_01627288	BPEP_ABB_01627299
749g	Ex. 138 Lease Forms Transmitted For Execution Map Area and Block Number GRCAN-744	BPEP_ABB_01627264	BPEP_ABB_01627275
749h	Ex. 139 Unit Agreement For Outer Continental Shelf Exploration, Development, and Production Operations on The Green Canyon Block 743 Unit	BPEP_ABB_01627552	BPEP_ABB_01627565
749i	Ex. 140 Supplemental Conservation Information Document	BPEP_ABB_01597639	BPEP_ABB_01597643

Sawyer-000089

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
749j	Ex. 141 Financial Decision Memorandum	BPEP_ABB_03534361	
749k	Ex. 142 Finance Memorandum GOM Deepwater Development Business Unit U.S. 5 Expenditure, Atlantis-IPT Bridge FM	BPEP_ABB_03534366	BPEP_ABB_03534369
749l	Ex. 143 Letter Farnsworth to Golden	BPEP_ABB_03534358	BPEP_ABB_03534359
749m	Ex. 144 Gulf of Mexico, Atlantis South Supplementary FM and Atlantis Phase 2 Strategy	BPEP_ABB_03534380	BPEP_ABB_03534393
749n	Ex. 145 Atlantis Field Fact Sheet		
749o	Ex. 146 U.S. Department of the Interior, Mineral Management Service, Basic OGOR Report	BPEP_ABB_00088596	BPEP_ABB_00088681
749p	Ex. 147 U.S. Department of the Interior, Mineral Management Service, Basic Royalty	BPEP_ABB_00088683	BPEP_ABB_00088712
749q	Ex. 148 Spreadsheet		
749r	Ex. 149 Unit Conversion Factors		
749s	Ex. 150 Exploration and Production BP Financial and Operating Information 2006-2010		
749t	Ex. 151 Spreadsheet		
750	Deposition and Exhibits of Garrick Malone		
750a	Ex. 62 30(b)(6) Deposition Notice - Engineering and Regulatory Matters		
750b	Ex. 63 Screen Shot Listing of Ten Books by Todd		
750c	Ex. 64 TH/ATL Documentum Data Search - User's Guide	BPEP_ABB_00115815	BPEP_ABB_00115827
750d	Ex. 65 BP/Sustala Ltr to MMS re: PSS App w-Atchmts	BPEP_ABB_01598219	BPEP_ABB_01598237
750e	Ex. 66 BP/Sustala Ltr to MMS re: PSS App w-Atchmts	BPEP_ABB_00084533	BPEP_ABB_00084554
750f	Ex. 67 BP/Sustala Ltr to MMS re: PSS App-Vol II w/ Atchmts	BPEP_ABB_00084932	BPEP_ABB_00084933
750g	Ex. 68 One-Page BP Certification - Design of ATL (re: PSS App)	BPEP_ABB_00085234	BPEP_ABB_00085234
750h	Ex. 69 BP/Todd Ltr to BOEMRE stating that ATL platform was certified by registered professional engineer	BPEP_ABB_00115564	BPEP_ABB_00115566
751	Deposition and Exhibits of Ryan Malone		
751a	Ex. 122 Resume of Ryan Patrick Malone		
751b	Ex. 123 Documents Reviewed by Ryan Malone in preparation for his deposition		
751c	Ex. 124 Chronology of Subsea Start-Up	Court Document Filing 147-28 (Exhibit to BP's Resp to Ps MPSJ)	
751d	Ex. 125 DC-1 Subsea P&ID 1440-30-SB-DG-0360-001 Rev. 11	From Todd Book 9	
751e	Ex. 126 DC1-SS1 P&ID Manifold Man-1A (AS BUILT) 1440-35-SB-DG-0388-001 Rev. 3	From Todd Book 9	
751f	Ex. 127 DC1-SS1 P&ID Manifold Man-2A (AS BUILT) 1440-35-DG-0388-002 Rev. 2	From Todd Book 9	
751g	Ex. 128 DC1-SS-1 P&ID Manifold Man-4A (AS BUILT) 1440-35-SB-DG-0388-003 Rev. 2	From Todd Book 9	

Sawyer-000090

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
751h	Ex. 129 DC113 P&ID Subsea Production Tree with Manual Override Fitted to "AMV" (AS BUILT) 1440-35-SB-DG-0278-001	From Todd Book 9	
751i	Ex. 130 P&ID Register DC1-Phase SS1, As-Built (Currently Installed) Rev. 1	BPEP_ABB_00096070	
751j	Ex. 131 DC-142 P&ID Production Tree w/Down Hole Flow Control & EVP (AS Built) 1440-35-SB-DG-0285-001 Rev. 2	From Todd Book 9	
752	Deposition and Exhibits of Lynn Osborne		
752a	Ex. 273 Subpoena to Testify at a Deposition or to Produce Documents in a Civil Action to Mustang Engineering, L.P.		
752b	Ex. 274 Topsides Design Engineering and Project Services Contract between BP Exploration and Oil Inc. Amoco Production Company and Mustang Engineering, Inc.		
752c	Ex. 275 Email from Ralph Phillips to Dennis Sustala re Production System Package Deliverables	BPEP_ABB_00110518	BPEP_ABB_00110520
752d	Ex. 276 Topsides Design Engineering and Project Services Contract between BP Exploration and Oil Inc Amoco Production Company and Mustang Engineering, Inc.		
752e	Ex. 277 Letter from Michele McNichol to Bryan Domangue re BP Atlantis Project Interview	BPEP_ABB_03456167	BPEP_ABB_03456167
752f	Ex. 278 MEI Project Document Control Procedure, BP Doc. No. 1400-10-AD-PR-0214	BPEP_ABB_03505155	BPEP_ABB_03505174
752g	Ex. 279 Email from Linn Osborn to Mike L. Garland re Atlantis Floating System Document Access	BPEP_ABB_03505962	BPEP_ABB_03505963
753	Deposition and Exhibits of Robert Peloubet		
753a	Ex. 79 BP Objection Letter to 30(b)(6) Notices		
753b	Ex. 80 Resume of Robert (Bob) Peloubet		
753c	Ex. 81 Documents Reviewed by Bob Peloubet in preparation for his deposition		
753d	Ex. 82 Broman Email to Peloubet sending sector sheets	BPEP_ABB_00099324	BPEP_ABB_00099327
753e	Ex. 83 Peloubet Memo to Todd re: Abbott Spreadsheets	BPEP_ABB_00082822	BPEP_ABB_00082828
753f	Ex. 84 Excerpt from Amended Complaint re: DC 1 Sector Closeout Report		
753g	Ex. 85 Todd E-mail to MMS	Court Filing 147-28, Exhibit D-2 (BP's Resp to Ps MPSJ)	
753h	Ex. 86 Subsea Project Execution Plan 1440-10-PM-RP-0001 Rev. 3	BPEP_ABB_00088809	BPEP_ABB_00088925
753i	Ex. 87 GoM Project Orientation and Procedures Manual POPM 1440-21-POPM-PR-0001 Rev. 3	BPEP_ABB_01453338	BPEP_ABB_01453435
753j	Ex. 88 Specification for Data and Information Handover from Projects into Operations 1400-85-IM-SP-8700 Rev. 1	BPEP_ABB_00115909	BPEP_ABB_00115961
753k	Ex. 89 Records Management Project Execution Plan (PEP) 1400-10-AD-PR-0005 Rev. 0	BPEP_ABB_01453170	BPEP_ABB_01453185
753l	Ex. 90 DWP Projects Document Control Procedure	BPEP_ABB_01631097	BPEP_ABB_01631120
753m	Ex. 91 Email from Duff to Naseman re: P&IDs for Operations	BPEP_ABB_01524673	BPEP_ABB_01524675
753n	Ex. 92 Drawings by DSME or GVA, no stamp, no as-built	BPEP_ABB_00022716, 720, 414, 450, 69?	
753o	Ex. 93 Safety Analysis Flow Diagrams	BPEP_ABB_00084560-4562, 4565, 4571	

Sawyer-000091

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
754	Deposition and Exhibits of Frank Ragan		
754a	Ex. 70 Deposition Notice - Individual Witnesses (Frank Ragan, Robert Peloubet, Ryan Malone, Ken DeJohn, Dennis Sustala)		
754b	Ex. 71 Plaintiffs' 1st RFP to Defendant		
754c	Ex. 72 BP Objection Letter to 30(b)(6) Notices		
754d	Ex. 73 Documents reviewed by Witness in preparation for deposition		
754e	Ex. 74 DeJohn Email to Sustala re: Information for the MMS	BPEP_ABB_00110016	BPEP_ABB_00110017
754f	Ex. 75 Ragan Email to DeJohn re: Information for the MMS	BPEP_ABB_00110014	BPEP_ABB_00110015
754g	Ex. 76 1-Pg Internet Printout: "HIPO Lessons Learned Investigation Summary" re: BP Oil Pipeline Tubing Failure		
754h	Ex. 77 11X17 P&ID Drawings (Mustang w/Stamps)	BPEP_ABB_00022219 & BPEP_ABB_00022253	
754i	Ex. 78 E-mail: Wilson to Sustala re: Atlantis GC787 A Platform, G23579-Corrected PSS Modification	BPEP_ABB_00108060	BPEP_ABB_00108061
755	Deposition and Exhibits of Dennis Sustala		
755a	Ex. 242 Documents Reviewed by Witness (Dennis Sustala) in Preparation for Deposition		
755b	Ex. 243 Sustala/BP Letter to MMS re: App for PVP (Platform Verification Plan)	Court Document Filing 147-17 (BP's Resp Ps MPSJ)	
755c	Ex. 243 Sustala/BP Ltrs to MMS w-Atchmnts re: App for PVP (Platform Verification Plan)	Court Document Filing 147-17 (BP's Resp Ps MPSJ)	
755d	Ex. 243 MSS Approval Response Letter to Sustala/BP re: PVP and CVA Nomination	Court Document Filing 147-17 (BP's Resp Ps MPSJ)	
755e	Ex. 244 Application to Design, Fabricate and Install a Platform Including Platform Verification Plan (PVP) and Nomination of Certified Verification Agent (CVA)	BPEP_ABB_00086577	BPEP_ABB_00086967
755f	Ex. 245 Sustala/BP Letter to MMS re: App for PVP (Platform Verification Plan) attaching Plat	BPEP_ABB_00086969	BPEP_ABB_00086971
755g	Ex. 246 Sustala/BP Letter to MMS requesting departure from 30 CFR 250.901(d) re: GVA Consultants (Swedish Entity) requiring certification by registered professional engineer	BPEP_ABB_00086986	BPEP_ABB_00087022
755h	Ex. 247 MMS Letter to BP/Sustala Approving departure from 30 CFR 250.091(d) pertaining to GVA Consultants	BPEP_ABB_00087025	BPEP_ABB_00087025
755i	Ex. 248 All Letters, without Attachments, Relating to BP's PSS Application: 2/23/05, 2/25/05 (2), 8/1/05 w/certification page, 10/11/05, 5/4/06, 5/8/06, 5/23/06, 9/19/06 (2), 9/25/06 Sustala/BP Letters to MMS re: PSS App; and 5/3/07 Response Letter from MMS to Sustala/BP	BPEP_ABB_01598219 - 8220, 00084533-4536, 00084932-3933 and 00085243, 00084236 - 5237, 00085386-5387, 00085538, 00084545, 00085561, 00085562, 00085722, 00085724 - 5727	
755j	Ex. 249 Sustala/BP Letter to MMS re: PSS App w/ Attachments	BPEP_ABB_01598219	BPEP_ABB_01598237

Sawyer-000092

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

No.	Document	Prod BegBates #	Prod EndBates #
755k	Ex. 250 Sustala/BP Letter to MMS re: PSS App w/ Attachments (includes large set of 11X17 P&IDs and 11X17 Volume 1 PSS App)	BPEP_ABB_00084533 - 4554, 84556-4697, and 84699-4930	
755l	Ex. 251 Sustala/BP Letter to MMS re: PSS App w/ Attachments (including Certification Page and 11X17 Volume 2 PSS App)	BPEP_ABB_00084932 - 4933, 5234, 03534013 - 4284	
755m	Ex. 252 Sustala/BP Letter to MMS re: PSS App w/ Attachment (Volume 1 PSS App Revised 10/3/05)	BPEP_ABB_00085236 - 5243, 5245-5384	
755n	Ex. 253 Sustala/BP Letter to MMS re: PSS App w/ Attachment (Volume 1 PSS App Revised 5/3/06)	BPEP_ABB_00085386 - 5387, 5389-5536	
755o	Ex. 254 Sustala/BP Letter to MMS re: PSS App w/ Attachment (Punch List from MMS 10/16/05 Walk-Through Inspection of Production System Integration Site in Corpus Christi, Texas)	BPEP_ABB_00085538	BPEP_ABB_00085543
755p	Ex. 255 Sustala/BP Letter to MMS re: PSS App w/ Attachment (3 Replacement Diagrams for Same Drawing Numbers Submitted 5/5/06)	BPEP_ABB_00085545	BPEP_ABB_00085551
755q	Ex. 256 Sustala/BP Letter to MMS re: PSS App w/ Attachments (including PSS App Volume 1 Revised 9/18/06)	BPEP_ABB_00085561 - 5566, 5568-5720	
755r	Ex. 257 Sustala/BP Letter to MMS re: PSS App identifying CD Enclosure (not attached to this letter)	BPEP_ABB_00085722	BPEP_ABB_00085722
755s	Ex. 258 MMS Approval Letter to Sustala/BP	BPEP_ABB_00085724	BPEP_ABB_00085727
755t	Ex. 259 Paragraph "1." Excerpt from 7/21/10 BOEMRE Letter to Simon Todd/BP (complete letter marked as Disc Exh 209)		
755u	Ex. 260 Excerpt from 30 CFR 205.901(d) [2002] - Paragraph (d)		
755v	Ex. 261 Page 9 from PVP App (Disc Exh 244) containing Section "2.6 Certification Statement - 30 CFR 250.901 (d)"	BPEP_ABB_00086590	BPEP_ABB_00086590
755w	Ex. 262 Atlantis Project Floating Systems Team Project Execution Plan 1440-50-PM-PR-0100 Rev. B	BPEP_ABB_00111486	BPEP_ABB_00111604
755x	Ex. 263 Excerpt from The Texas Board of Engineering Sealing Rules - Section 137.33 (a) re: Purpose of Seal		
755y	Ex. 264 Email from Sustala to Various re: Certification Requirements for Platforms and Production Systems (discusses PE Stamps)	BPEP_ABB_00112453	BPEP_ABB_00112454
755z	Ex. 265 Email from Sustala to Kinnaman/Mustang re: PE Waiver Request Documentation	BPEP_ABB_00110497	BPEP_ABB_00110499
755aa	Ex. 266 RETIRED NUMBER		
755bb	Ex. 267 Email from Domangue/BOEMRE to Sustala/BP asking for BP's "As Built" standard	BPEP_ABB_01622474	BPEP_ABB_01622474
755cc	Ex. 268 Excerpt from The Texas Engineering Practice Act: Section 1001.401 (a-c) - Use of Seal and Board Sealing Rules Section 137.33 - Sealing Procedures (a), (e) and (f)		
755dd	Ex. 269 RETIRED NUMBER		
755ee	Ex. 270 Excerpt: Certification of Design Requirement 30 CFR 250.801(e)(5)		
755ff	Ex. 271 Excerpt from Atlantis Records Management Project Execution Plan 1440-10-AD-PR-0005: Section 6.8 Regulatory Requirements (Specific requirements for As-Built documents)		
755gg	Ex. 272 Excerpt from BP Specification for Data and Information Handover from Projects into Operations Specification Number 1400-85-IM-SP-8700 [2003]: Section 4.2 As Built documentation; and Testimony Excerpt from Ken DeJohn (BP Corp Rep) re: As-Built identification impractical		

Sawyer-000093

ABBOTT, ET AL v. BPEP, ET AL
Case No. 09-01193

Mike Sawyer

[illegible]

Sawyer-000094

Appendix C

APPENDIX C
Deposition & Trial Testimony in United States by Mike Sawyer

Depositions

1. Plaintiff; M R Cowen PC in Benigo Rico, et. al. vs. Titan Tire Corporation of Texas, et. al. Cause No. 2002-04-1465B
2. Plaintiff; Hockema, Tippit & Escobedo, LLP in Regalado vs. ADT Security Services & Al Uhlenhoff Security; Cause No. 2003CVQ0000785D2
3. Plaintiff Committee (comprising of numerous Law Firms) in Arenazas & Ramon, and et. al., vs. British Petroleum Corporation North America, Inc., et. al., Cause No. 05CV0347; 2005 – 2006
4. Plaintiff; Tucker Vaughan in Pardon vs. Waste Energy Technology LLC; Cause No. 2006-29506
5. Plaintiff; Falk Metz LLC in AmeriCold vs. Alta Refrigeration; Civil No. 07-SV-0850
6. Plaintiff; Holm, Bambace in Evans vs. Delmar Disposal Company in Cause No. 07-11938
7. Plaintiff; Perry & Haas in Benavides vs. Sherwin Alumina LP; Cause No. S-06-5037CVA
8. Defense; King & Spalding in Ring vs. Formosa Plastics Corp; Cause No. 08-03-0450
9. Plaintiff; Archer & Greiner, PC in Ferguson, et. al vs. Valero Energy Corp; Civil Action No. 06-CV-540
10. Plaintiff; Buchanan Law Office in Martin vs. PRSI; Cause No. 2009-63557
11. Plaintiff; Wigington, Rumley Dunn, LLP in Gamez vs. CM Towers, Inc ; Cause No. 09-515-C
12. Plaintiff; Abraham, Watkins, Nichols, Sorrels, Agosto, & Friend in Gutierrez vs. PRSI; Cause No. 2009-38113

Trial Testimony

1. OSHA Solicitors; Secretary vs. Randalls Food and Drugs, Inc., OSHRC DOCKET NO. 02-1398
2. Plaintiff Committee (comprising of numerous Law Firms) in Arenazas & Ramon, and et. al., vs. British Petroleum Corporation North America, Inc., et. al., Cause No. 05CV0347
3. Plaintiff; Hockema, Tippit & Escobedo, LLP in Regalado vs. ADT Security Services & Al Uhlenhoff Security; Cause No. 2003CVQ0000785D2
4. Plaintiff; Tucker Vaughan in Pardon vs. Waste Energy Technology LLC; Cause No. 2006-29506
5. Defense; King & Spalding in Ring vs. Formosa Plastics Corp in Cause No. 08-03-0450
6. Plaintiff; Buchanan Law Office in Martin vs. PRSI; Cause No. 2009-63557

Appendix D



1301 Regents Park Drive
Suite 101
Houston, TX 77058
(281) 488-1507
(281) 488-1506 (fax)
Web Site: <http://www.apexsafety.com>

FEE SCHEDULE

Engineering Rate:

Mike Sawyer, P.E., CSP	
Research, Deposition, Trial Testimony, etc.	\$265 per hour
Contract Labor- Engineering	\$175 per hour
Contract Labor – Technical	\$100 per hour

Support Service Rate:

Documentation Assistant	\$ 65 per hour
Contract Labor –Documentation Support	\$ 45 per hour +

Travel and other expenses charged at cost; all travel time is chargeable.

FEE SCHEDULE

Engineering Rate:

Mike Sawyer, P.E., CSP	
Research, Deposition, Trial Testimony, etc.	\$265 per hour
Contract Labor- Engineering	\$175 per hour
Contract Labor – Technical	\$100 per hour

Support Service Rate:

Sawyer-000099

Appendix E

APPENDIX E

Spreadsheets by Mike Sawyer ("MS" Spreadsheets)

MS1: As Built Stats – Books 1-6

MS2: PE Stamps Stats - Books 1-6

MS3: PE Stats - PSS App Folders

MS4: AB and Stamp Stats – Books 7-8

MS5: AB and Stamp Stats – Books 9-10

MS6: AB and Stamp Stats – Books 7-10

MS7: HO First Oil

30 CFR 250.905(d) requires a complete set of structural drawings. Simon Todd Production breakdown is as follows						
Simon Todd Production Book No.	File Name	Total Drawings in File	No. of Structural drawings in File	No. of drawings marked As- Built as Defined in BP Spec. 1400-85-IM-SP-8700	% OF Drawgs Marked As Built	Drawing Prepared by
1	Topside Compression Module	267	267		0%	Mustang
1	Topside Flareboom	13	13	4	31%	Mustang
1	Topside Generation Module	150	150	1	1%	Mustang
2	Topside Generation Module Continued	114	114		0%	Mustang
2	Topside Production Module	329	329	1	0%	Mustang
2	Topside Skid Drawings	77	77	5	6%	Mustang
	TOTALS for Mustang	950	950	11	1.2%	
3	Hull Columns & Bracing	50	44	2	4%	DSME
3	Hull General	84	84	7	8%	GVA & DSME
3	Hull Pontoons	150	150	10	7%	DSME
3	Upper Hull	157	157	26	17%	DSME
4	Access Hatchet & Manhole Covers	48			0%	DSME
4	Fendering Frame	12	12		0%	DSME
4	Helideck	35	12	4	11%	DSME
4	Lifeboats	6			0%	DSME
4	Module Installation Guides	8	8	1	13%	DSME
4	Mooring	69	69		0%	DSME
4	SCR & Umbilical Pull-In Layout	18	18		0%	DSME
4	Steel Door	9			0%	DSME
4	Towing System	43			0%	DSME
5	Draught Marks	5			0%	DSME
5	External Railings	95			0%	DSME
5	Internal Stairs & Ladders	95			0%	DSME
5	Ladders in Cargo	79			0%	DSME
5	Lifesaving Equipment	3			0%	DSME
5	Lifts	24			0%	DSME
5	Miscellaneous	29		2	7%	DSME
6	Mooring Lines	19	19	8	42%	ScanRope & Vicinay Cadenas
6	Suction Anchoring Piles	116	116	1	1%	KBR & Kiewit Offshore
	TOTALS for DSME & Others	1154	689	61	5.3%	
GRAND TOTAL FOR ALL OF BOOKS 1-6		2104	1639	72	3.4%	
Blank spaces in table indicate zeros						

30 CFR 250.905(d) requires a complete set of structural drawings. Simon Todd Production breakdown is as follows									
Simon Todd Production Book No.	File Name	Total Drawings in File	No. of Structural drawings in File	No. of drawings w/PE Stamp	% w/PE Stamp	No. of Stamped drawings with No Stamp for Current Rev	No of drawings w/ PE Stamp for Current Rev.	% w/PE Stamp for Current Rev.	Drawing Prepared by
1	Topside Compression Module	267	267	266	99.6%	81	185	69%	Mustang
1	Topside Flareboom	13	13	13	100.0%	7	6	46%	Mustang
1	Topside Generation Module	150	150	150	100.0%	67	83	55%	Mustang
2	Topside Generation Module Continued	114	114	111	97.4%	35	76	67%	Mustang
2	Topside Production Module	329	329	328	99.7%	125	203	62%	Mustang
2	Topside Skid Drawings	77	77	77	100.0%	30	47	61%	Mustang
							0		
	TOTALS for Mustang	950	950	945	99.5%	345	600	63%	
3	Hull Columns & Bracing	50	44		0.0%		0	0%	DSME
3	Hull General	84	84	5	6.0%		5	6%	GVA & DSME
3	Hull Pontoons	150	150	1	0.7%		1	1%	DSME
3	Upper Hull	157	157		0.0%		0	0%	DSME
4	Access Hatchet & Manhole Covers	48			0.0%		0	0%	DSME
4	Fendering Frame	12	12		0.0%		0	0%	DSME
4	Helideck	35	12		0.0%		0	0%	DSME
4	Lifeboats	6			0.0%		0	0%	DSME
4	Module Installation Guides	8	8		0.0%		0	0%	DSME
4	Mooring	69	69		0.0%		0	0%	DSME
4	SCR & Umbilical Pull-In Layout	18	18		0.0%		0	0%	DSME
4	Steel Door	9			0.0%		0	0%	DSME
4	Towing System	43			0.0%		0	0%	DSME
5	Draught Marks	5			0.0%		0	0%	DSME
5	External Railings	95		2	2.1%		2	2%	DSME
5	Internal Stairs & Ladders	95			0.0%		0	0%	DSME
5	Ladders in Cargo	79			0.0%		0	0%	DSME
5	Lifesaving Equipment	3			0.0%		0	0%	DSME
5	Lifts	24			0.0%		0	0%	DSME
5	Miscellaneous	29			0.0%		0	0%	DSME
6	Mooring Lines	19	19		0.0%		0	0%	ScanRope & Vicinay Cadenas
6	Suction Anchoring Piles	116	116		0.0%		0	0%	KBR & Kiewit Offshore
							0		
	TOTALS for DSME & Others	1154	689	8	0.7%	0	8	1%	
GRAND TOTAL OF ALL DRAWINGS		2104					608	29%	
Blank spaces in table indicate zeros									

PSS Folder	File Name	Total Drawings in File	No. of drawings w/PE Stamp	No. of Stamped drawings with No Stamp for Current Rev	Drawing Prepared by
2006-09-18 PSS-14 Vol 1 Amended	SAFD, Rev 4	17			Mustang
2005-02-25 PSS-2 Vol 1	SAFD, Rev 1	15			
2005-08-01 PSS-5 Vol 2	Safety Plan	6			Mustang
2005-08-01 PSS-5 Vol 2	Hull Drawings	20			Mustang
2005-08-01 PSS-5 Vol 2	Topsides Layouts	9			Mustang
2005-08-01 PSS-5 Vol 2	Hull Layouts	18			DSME
2005-08-01 PSS-5 Vol 2	Safety Plans Topside	7			Mustang
2005-08-01 PSS-5 Vol 2	Safety Plans Hull	20			Mustang
2005-08-01 PSS-5 Vol 2	Topsides Elec One Lines	78			Mustang
2005-08-01 PSS-5 Vol 2	Hull Elec One Lines	90			DSME
2005-08-01 PSS-5 Vol 2	Topsides Haz Area Class Plans	10			Mustang
2005-08-01 PSS-5 Vol 2	Hull Haz Area Class Plans	10			DSME
2005-02-25 PSS-3 P&IDs	SAFE Chart P&IDs & Others	222			Mustang
	TOTALS for PSS Folders	522	0	0	
Blank spaces in table indicate zeros					

	breakdown is as follows							
Simon Todd Production Book No.	File Name	Total Drawings in File	No. of drawings w/PE Stamp	% of drawings w/ PE stamp	No. of Stamped drawings with No Stamp for Current Rev	No. of drawings marked As- Built	% of Drawings Marked "As Built"	Drawing Prepared by
7	Hazardous Area Classification	19		0.00%		2	10.5%	Mustang
7	Hull Layout	19		0.00%		1	5.3%	DSME
7	Hull One Lines	91		0.00%		4	4.4%	DSME
7	Hull Safety Plans	20		0.00%		20	100.0%	Mustang & Worley Parsons
7	SAFD	18		0.00%		2	11.1%	Mustang
7	Topside Firewater P&IDs	15		0.00%		5	33.3%	Mustang & DSME
7	Topside Layout	19		0.00%		3	15.8%	Mustang
7	Topside One Lines	79		0.00%		5	6.3%	Mustang
7	Topside Safety Plans	7		0.00%		7	100.0%	Mustang
8	Topside P&IDs	256		0.00%		80		Mustang
	TOTALS for Books 7-8	543	0	0.00%	0	129	23.8%	

	Simon Todd Production breakdown is as follows								
Simon Todd Production Book No.	File Name	Total Drawings in File	No. of drawings w/PE Stamp	% oOf drawings w/ PE stamp	No. of Stamped drawings with No Stamp for Current Rev	No. of drawings marked As-Built	% of Drawings As Built	Drawing Prepared by	
9	Area Equipment	5		0.00%		5	100%	Technip USA	
9	DC1-DC3 P&IDs	13		0.00%		6	46%	Technip USA	
9	DC1 P&IDs	48	8	16.67%	1	39	81%	Technip USA	
9	DC3-PID'S	10		0.00%		9	90%	Technip USA	
9	DC3 Base Case Jumpers	3		0.00%			0%		
9	DC3 GA Jumper	10		0.00%			0%		
9	Diverter	5		0.00%			0%	FMC	
9	Flowlines & Manifold Jumpers	56		0.00%		45	80%		
9	Flowlines & Risers	43	43	100.00%			0%	Technip USA	
9	General Arrangement Jumper	1		0.00%			0%		
9	Tree	10		0.00%			0%	FMC	
9	Umbilicals Align	12		0.00%	12*	12	100%	SubSea 7	* These drawings have survey certificate certifying 'as-built survey, yet this was not signed or dated by Professional Land Surveyor
9	Umbilicals Cross	8		0.00%		8	100%	Nexans Norway	
9	Umbilical Field	7		0.00%		5	71%	Technip USA	
9	Umbilical Schematic	50		0.00%		38	76%	Technip USA	
9	Well to Manifold Jumpers	100	60	60.00%	52	56	56%		
10	3-P1 PLEM	13	12	92.31%	12		0%	Technip USA	
10	DC3 1st End PLET SS1	19	19	100.00%	19		0%	Technip USA	
10	DC3 2nd End PLET SS1	20	20	100.00%	20		0%	Technip USA	
10	I-PLETS	7	2	28.57%			0%	Technip USA	
10	OX-PLEM	13	13	100.00%	13		0%	Technip USA	
10	PLET Gen Drwgs	14	14	100.00%			0%	GSPE Engr	
10	PLET P & P1	31	30	96.77%			0%	GSPE Engr	
10	PLETS P2 & P3	28	28	100.00%			0%	GSPE Engr	
10	PLETS T	28	28	100.00%			0%	GSPE Engr	
10	PP1 PLEM	12	12	100.00%			0%	GSPE Engr	
10	PP2-3 PLEM	12	12	100.00%			0%	GSPE Engr	
10	PP PLEM	12	12	100.00%			0%	GSPE Engr	
10	Common Drawings	35		0.00%			0%	FMC & Oil State Industries	
10	SS1-Manifold North 1	22		0.00%		2	9%	Oil State Industries	
10	SS1-Manifold South 2	22		0.00%		2	9%	Oil State Industries	
10	SS1-Manifold South 4	24		0.00%		3	13%	Oil State Industries	
10	SS2 Common Drawings	12		0.00%			0%	Oil State Industries	
10	SS2-Manifold North 3	11		0.00%			0%	Oil State Industries	
10	SS2-Manifold North 5	11		0.00%			0%	Oil State Industries	
10	SS2-Manifold North 7	12		0.00%			0%	Oil State Industries	
10	T- PLETS	8	2	25.00%			0%	Technip USA	
10	TP PLEM	13	13	100.00%			0%	Technip USA	
10	Y PLET MOD	8	2	25.00%			0%	Technip USA	
	TOTALS for Books 9-10	768	330	42.97%	117	230	30%		
Blank spaces in table indicate zeros									

	Simon Todd Production breakdown is as follows							
Simon Todd Production Book No.	File Name	Total Drawings in File	No. of drawings w/PE Stamp	% oof drawings w/ PE stamp	No. of Stamped drawings with No Stamp for Current Rev	No. of drawings marked As-Built	% of Drawings As Built	Drawing Prepared by
8	Topside P&IDs	256		0.00%		80	31%	Mustang
9	DC1-DC3 P&IDs	13		0.00%		6	46%	Technip USA
9	DC1 P&IDs	48	8	16.67%	1	33	69%	Technip USA
9	DC3-PID'S	10		0.00%		9	90%	Technip USA
	TOTALS for P&IDs Books 7-10	327	8	2.45%	1	128	39%	
Blank spaces in table indicate zeros								

MSR: HO First Oil

EQUIPMENT USED ON OCTOBER 6, 2007 (DC-111)	IN REV. 0 HANDOVER PACKAGE?	DATED PRIOR TO FIRST OIL?	AS-BUILT AT FIRST OIL?	ENGINEER STAMP AT FIRST OIL?	AS-BUILT NOW?	ENGINEER STAMP NOW?	IN TECHNIP MASTER DOCUMENT REGISTER ON JANUARY 10, 2008?
TREE #4							
TREE #4 P&ID: 1440-35-SB-DG-0109, Rev. 1	N	Y	N	N	N	N	Y
TREE #4 MECHANICAL: 1440-32-SB-DG-5000, Rev. B	N	Y	N	N	N	N	N
TREE #4 HANDOVER PACKAGE: 1440-36-HU-MA-0112; REV. 0	NA	N	NA	NA	NA	NA	N
MANIFOLD 1A							
MANIFOLD 1A P&ID: 1440-35-SB-DG-0388-001; Rev. A	N	N	N	N	Y	N	N
MANIFOLD 1A MECHANICAL: 1440-34-HE-DG-9364-001/2; Rev. 1	N	Y (Reviewed and initialed after first oil.)	Y	N	Y	N	Y
PLEM TP, PLET T AND FLOWLINE T							
PLEM TP, PLET T and FLOWLINE T P&ID: 1440-30-SB-DG-0388-004; Rev. A	N	N	N	N	Y	N	N
PLEM TP MECHANICAL: 1440-30-SB-DG-0345-001/13	N	Y	N	Y	N	Y	Y
PLET T MECHANICAL: 1440-34-ST-DG-4003; Rev. 3	N	Y	N	Y-V	N	Y-V	Y
MANIFOLD 1A, PLEM TP, PLET T, AND FLOWLINE T HANDOVER PACKAGE: 1440-34-HU-MA-0295; Rev. 0 and1440-34-HU-MA-0296; Rev. 0	NA	N	NA	NA	NA	NA	N
HYDRAULIC UMBILICAL H6							
HYDRAULIC UMBILICAL H6 P&ID: 1440-35-SB-DG-0123-001/3; Rev. 1	Listed only.	Y	N	N	Y	N	Y
UMBILICAL H6 HANDOVER PACKAGE; 1440-36-HU-MA-0111; Rev. 0	NA	N	NA	NA	NA	NA	N
ELECTRICAL UMBILICAL E4							
ELECTRICAL UMBILICAL E4 P&ID: 1440-30-SB-DG-0218-001/3; Rev. 0	A revision dated after first oil is listed only.	Y	N	N	Y	N	A revision dated afer first oil is present.
ELECTRICAL UMBILICAL E4 HANDOVER PACKAGE: 1440-36-HU-MA-0112; Rev. 0	NA	N	NA	NA	NA	NA	N
SUBSEA							
SUBSEA P&ID;1440-30-SB-DG-0360-002; Rev. 4	N	Y	N	N	Y	N	Y

Appendix F